Idaho-Maryland Mine Project

SCH# 2020070378

Final Environmental Impact Report

Volume VI.A of IX
(Chapter 2 *Continued*)

Prepared for
County of Nevada

December 2022

Prepared by

RANEY PLANNING & MANAGEMENT, INC. 20 years
1501 Sports Drive, Suite A, Sacramento, CA 95834

2. Responses to Comments *(CONTINUED)*

Individual Letter 704

February 20, 2022

Dear Nevada County Board of Supervisors,

Ind 704-1 I OPPOSE the Idaho-Maryland Gold Mine being reopened by Rise Mining Company

As a registered voter in Nevada County and a homeowner in Cedar Ridge, I am deeply concerned aboul the proposed possibility of reopening the Idaho-Maryland Mine in my backyard and underneath my feet.

I have downloaded and reviewed the EIR report.

Here are the reasons why I oppose reopening the Idaho-Maryland Mine:

Ind 704-2 MINE WASTE and WATER POLLUTION
Gold mining produces huge amounts of mining waste, some of which contain heavy metals and other toxic substances. Both waste rock and tailings threaten to pollute groundwater and surface water. Our community is still dealing with arsenic and the leaching of heavy metals from the Gold-Era days. And now, Rise, a Canadian company comes along and wants to produce even more mine waste for 80 years: 182,500 tons per year! More tailings that polluting big rig trucks will need to haul away with the potential for leaching more arsenic into our waterways for generations to come.

Ind 704-3 INCREASE GREENHOUSE GAS EMISSIONS
Haul trucks, up to 100 round trips PER DAY will be needed to transport this mine waste, significantly increasing the amount of air pollution and greenhouse gas emissions into our community's air.

Ind 704-4 TRAFFIC AND SAFETY
The increase of vehicles, specifically 20 ton haul trucks, up to 100 round trips per day on Brunswick Road and the Cedar Ridge Y (Brunswick Road and Highway 174) intersection will be significant and unavoidable! This is according to the EIR report. Are the supervisors aware that the Union Hill School District, with over 800 students and staff, are within the boundaries of these dangerous roads and intersections? The same intersection and roads that school buses and parents use to transport students to school five days a week, twice a day. The same roadways that the EIR report states will be significant and unavoidable even after implementation of feasible measures. Reopening the Mine will threaten the safety of our children, their parents, and the over 100 school staff members from the nearby Union Hill School.

Is the pursuit of gold really worth so much environmental destruction AND the real potential for significant and unavoidable auto accidents between 20 ton trucks and children in cars/buses?
I think not. Vote NO to Rise MIning Company.

Ind 704-5 Sincerely,

Rose Capaccioli,
mailing address: P.O. Box 1812, Cedar Ridge, CA 95924
physical address: 11073 Cedar Ridge Dr., Grass Valley, CA 95945

INDIVIDUAL LETTER 704: ROSE CAPACCIOLI

Response to Comment Ind 704-1

The commenter does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Response to Comment Ind 704-2

Please see Master Response 8 – Mine Waste Characterization and Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Ind 704-3

For general concerns regarding greenhouse gas emissions, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. Please also see Master Response 18 – Air Quality Thresholds, Master Response 19 – NSAQMD Criteria Pollutant Thresholds During Operations, Master Response 27 – Greenhouse Gas Thresholds, and Master Response 28 – Greenhouse Gas Credits.

Response to Comment Ind 704-4

The DEIR states that no project truck traffic would occur on State Route 174, nor the intersection of SR 174/Brunswick Road (DEIR, Table 4.12-9.) This is because the designated haul routes for the project are north of the Sites (see Figure 3-13 of the DEIR), as described thusly on page 4.12-85 of the DEIR:

- To Centennial Industrial Site Haul Route
  - Brunswick Road northbound between E. Bennett Road and Whispering Pines Lane;
  - E. Bennett Road between Project Driveway and Brunswick Road (eastbound)
- To SR 49 Haul Route
  - Brunswick Road northbound between E. Bennett Road and Whispering Pines Lane;
  - Brunswick Road northbound between Whispering Pines Lane and SR 49;
  - E. Bennett Road between Project Driveway and Brunswick Road (eastbound)

The project's contribution of traffic to the SR 174/Brunswick Road intersection is solely related to employee commute trips.

Response to Comment Ind 704-5

Please see the above responses to the commenter's concerns. The concerns are noted for the record and have been forwarded to the decisionmakers for their consideration.

Individual Letter 705

February 20, 2022

Dear Nevada County Board of Supervisors:

I OPPOSE the Idaho-Maryland Gold Mine being reopened by Rise Mining Company.

As a registered voter in Nevada County and a homeowner in Cedar Ridge, I am deeply concerned about the proposed possibility of reopening the Idaho-Maryland Mine in my backyard and underneath my feet.

I have downloaded and reviewed the EIR report.

Here are the reasons why I oppose reopening the Idaho-Maryland Mine:

MINE WASTE and WATER POLLUTION
Gold mining produces huge amounts of mining waste, some of which contain heavy metals and other toxic substances. Both waste rock and tailings threaten to pollute groundwater and surface water. Our community is still dealing with arsenic and the leaching of heavy metals from the Gold-Era days. And now, Rise, a Canadian company comes along and wants to produce even more mine waste for 80 years: 182,500 tons per year! More tailings that polluting big rig trucks will need to haul away with the potential for leaching more arsenic into our waterways for generations to come.

Ind 705-1

INCREASE GREENHOUSE GAS EMISSIONS
Haul trucks, up to 100 round trips PER DAY will be needed to transport this mine waste, significantly increasing the amount of air pollution and greenhouse gas emissions into our community's air.

TRAFFIC AND SAFETY
The increase of vehicles, specifically 20 ton haul trucks, up to 100 round trips per day on Brunswick Road and the Cedar Ridge Y (Brunswick Road and Highway 174) intersection will be significant and unavoidable! This is according to the EIR report. Are the supervisors aware that the Union Hill School District, with over 800 students and staff, are within the boundaries of these dangerous roads and intersections? The same intersection and roads that school buses and parents use to transport students to school five days a week, twice a day. The same roadways that the EIR report states will be significant and unavoidable even after implementation of feasible measures. Reopening the Mine will threaten the safety of our children, their parents, and the over 100 school staff members from the nearby Union Hill School.

Is the pursuit of gold really worth so much environmental destruction AND the real potential for significant and unavoidable auto accidents between 20 ton trucks and children in cars/buses?
I think not. Vote NO to Rise MIning Company.

Sincerely,

Rosemarie Capaccioli

Rosemarie Capaccioli,
mailing address: P.O. Box 1812, Cedar Ridge, CA 95924
physical address: 11073 Cedar Ridge Dr., Grass Valley, CA 95945

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FEB 25 2022
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PLANNING DEPARTMENT

INDIVIDUAL LETTER 705: ROSEMARIE CAPACCIOLI

Response to Comment Ind 705-1

Please refer to Responses to Comments Ind 704-1 through Ind 704-5.

Individual Letter 706

From: Ross Guenther <rossguenther@comcast.net>
Sent: Thursday, March 24, 2022 2:55 PM
To: Idaho MMEIR
Cc: Matt Kelley
Subject: Comments on the Idaho-Maryland Draft EIR

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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Please include the following comments for the Idaho-Maryland Mine Draft EIR:

REOPENING THE IDAHO-MARYLAND MINE WITH ZERO WASTE

The gold at the Idaho-Maryland Mine may be just the icing on the cake. The primary value for the people of Nevada County is likely the much needed clean and sustainable aggregate and ceramic building products that might otherwise remain as waste dump rock and mill tailings.

Ind 706-1

Having worked and studied the Idaho-Maryland Mine over the past half century, I had documented most of the same geologic conclusions as Rise Gold in their present Draft Environmental Impact Report (DEIR). In the mid 1990s I received a final EIR, and related permits to dewater the New Brunswick shaft. Later, new management changed the location for the main shaft from the Brunswick to the Centennial site. Subsequently, my team and I ran successful Ceramext™ pilot test tile plants at the Idaho-Maryland Mine. We also ran successful tests for over 50 types of tailings including basalt fines with the Pacific Northwest National Laboratory, and tailings for several copper and gold mines.

The Idaho-Maryland Mine tailings advantageously have only very amounts of arsenic. The contaminates, if any, are rendered inert to leaching or other means by locking them within a stable glassy matrix within the Ceramext composition. My team has patented several composition and method patents for manufacturing ceramics.

Recently I was asked to write a case study by the Editor of "Tailings Management Handbook, A Life-Cycle Approach". The Handbook was published in February, 2022 by The Society for Mining, Metallurgy & Exploration. The case study was titled "Repurposing Tailings and Other Earth Material Waste into Ceramics". The study included a review of the success in manufacturing high quality tile at the Idaho-Maryland Mine. The Handbook dives into a wealth of information contributed by more than 100 world-renowned experts and was edited by Kimberly Fink Morrison, Senior Director, Global Tailings Management, of Newmont. It should be essential that consultants for the Nevada County Planning Commission consider the Handbook's findings.

Ind 706-2

Part of the SME Handbook discusses co-disposal of tailings, a relatively recent method of combining larger barren dump rock with much finer mine tailings. This method is proposed in the Rise Gold DEIR to contain mine wastes at the Centennial and Brunswick sites of the Idaho-Maryland Mine and has several potential disadvantages. These disadvantages include the difficult compaction required, complexity of mixing particle sizes, and being more difficult and expensive than other methods. Also mentioned is that the method could be a ground stability hazard in wet seasons in populated areas.

Ind 706-3

Extensive compaction tests were made by Ceramext of Idaho-Maryland historic tailings and of freshly crushed core samples of many mineral grain sizes (including some with larger fragments) with optimal wetness and extremely high pressures. This was for ceramic production prior to firing. In all cases the compacted material had very low strength and could not withstand even

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small amounts of added water without becoming liquified. This could likely result in the tailings dangerously flowing down Wolf Creek into the city of Grass valley, gradually or all at once, for both the Brunswick and Centennial proposed tailings storage areas.

A better alternative would be to manufacture profitable high-quality low-cost floor and roofing tile, wall siding, counter-tops and many other green fireproof ceramic building products from the tailings. The larger waste development dump rock could be profitably sold as aggregate. If this profitable alternative of manufacturing ceramics is taken, the entire project could be done on the Brunswick industrial site without hauling tailings and development rock to the Centennial site.

Ind 706-4

In our area, as well as throughout the world, we are having problems with climate change, fires, and drought. Complicating this problem further are supply chain issues causing more delays, expenses and pollution from importing ceramics and other materials from China and other distant places. NID could economically conserve more water by using canal liners and piping made from tailings ceramics. PG&E presently needs thousands of miles of underground conduits (possibly partially made with tailings ceramics) to prevent wildfires and lower our energy costs.

In Nevada County we can have a clean and sustainable gold mine without waste dumps and excessive traffic, and produce high quality ceramics. So yes, you can have your cake and eat it too.

Ross Guenther is the General Manager of Ceramext, LLC and lives in Penn Valley, CA.

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INDIVIDUAL LETTER 706: ROSS GUENTHER

Response to Comment Ind 706-1

The commenter proposes an alternative to the use of sand tailings as engineered fill by manufacturing tailings into ceramic products. This process was analyzed for a project proposed by a previous applicant in a Draft Environmental Impact report prepared by Environmental Science Associates for the City of Grass Valley in 2008 (ESA 2008)[1]. The 2008 DEIR contemplated a 600 ton per day ceramics plant (Phase I) with expansion of ceramic production to 1,200 tons per day (Phase II) (see Section 2.7 of ESA 2008). The Phase I production rate is similar to the amount of sand tailings proposed to be used for engineered fill by the current proposed Idaho-Maryland Mine Project. The project was found to have a significant and unavoidable air quality impact due to NO_x emissions, primarily due to the manufacturing of ceramic products. Operational NO_x emissions for Phase I were estimated at 643 pounds per day (see Table 4.2-6 of ESA 2008). The project was found to have a significant and unavoidable impact on global climate change due to CO_2 emissions, primarily due to the manufacturing of ceramic products (see Section 4.2.4 of ESA 2008). Construction and Operational CO_2 emissions for Phase I were estimated at more than 70,000 metric tons per year of CO_2e (see Table 4.2-8 of ESA 2008). The commenter's proposed alternative would substantially increase the severity of impacts for the current proposed Idaho-Maryland Mine Project and create at least two new significant and unavoidable impacts. The commenter does not provide any information of how this alternative would lessen any impacts from the current proposed project. Further, the market for ceramic products made from material generated by the mine is speculative, and there is no evidence that such a market exists. An EIR need not evaluate an alternative that is considered speculative, theoretical, or unreasonable. Not every potentially feasible alternative need be considered; rather, the relevant test is whether a "*reasonable range*" of feasible alternatives is considered for that particular project (Guidelines §15126.6(a)). Given that the proposed alternative would create new significant impacts, has not been shown to reduce any significant impacts, and is speculative, the commenter's proposed alterative is not considered further.

Response to Comment Ind 706-2

The commenter asserts that the project's proposed method of using waste rock and tailings for engineered fill has disadvantages due to compaction and mixing difficulties. NV5 provides recommendations for blending of rock and tailings on page 14 of appendix H.1 to the DEIR. As stated on this page, crushed blast rock with a maximum dimension of 6 inches may be blended into sand tailings to produce engineered fill material of up to 2 parts blast rock to 1 part sand tailings. A greater ratio may be feasible but would likely not be testable using nuclear methods and require a procedural test method. The engineered fill methods proposed in the DEIR are feasible based on the analysis done by NV5 in appendix H.1 to the DEIR.

The commenter states that the method of blending larger barren rock with much finer tailings would be a ground stability hazard in wet seasons in populated areas. The stability of engineered fill slopes, and response to precipitation and storms, is discussed on page 4.6-34 of the DEIR. The face of the fill should be easily maintainable at a slope of 1 to 3 (rise over run). The fill is going to be constructed over a period of years, and while most of the surface can be maintained in a finished, or semi-finished and stable vegetated condition, during the life of the project, there will likely be areas that will be open and subject to potential erosion should a larger than expected storm occur. An important design feature shown on the grading plans are the detention ponds

[1] ESA (Environmental Science Associates). (2008). *Draft Idaho-Maryland Mine Project Environmental Impact Report* San Francisco, California.

that are to be constructed immediately down-gradient of the fill areas. These ponds, while collecting sediments, also provide a second level of containment in the event that unanticipated erosion of an open surface occurs. Further, the design of the pond will allow any eroded material that has entered it to be recovered and reused beneficially. According to ECM's peer review of the DEIR and appendices, the design has been well thought out and is appropriate for the Site and project.

The commenter does not identify any inadequacies in the DEIR's analysis.

Response to Comment Ind 706-3

The economic benefit of converting sand tailings to ceramics is a not a CEQA issue required to be analyzed in the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

The commenter states that even a small amount of water added to compacted engineered fill could lead to liquefaction and result in tailings dangerously flowing down Wolf Creek into the city of Grass Valley. However, as stated on page 4.6-11 of the DEIR, liquefaction occurs when saturated fine-grained sands and/or silts lose physical strength temporarily during earthquake induced shaking and behave as a liquid due to the loss of point-to-point grain contact and transfer of normal stress to the pore water. Liquefaction potential varies with water level, soil type, material gradation, relative density, and probable intensity and duration of ground shaking. As stated on page 4.6-41 of the DEIR, the Geotechnical Engineering Reports concluded that the overall potential for liquefaction at both the Centennial and Brunswick Industrial Sites is remote. ECM was retained by Raney (the County's EIR consultant) to perform an independent third-party peer review of the geotechnical documents prepared by NV5. ECM's peer review did not identify any deficiencies in NV5's reports. (see Page 4.6-29 of the DEIR)

Please also see Response to Comment Ind 706-1 regarding the commenter's proposed alternative.

Response to Comment Ind 706-4

Please see Response to Comment Ind 706-1 regarding the commenter's proposed alternative.

Individual Letter 707

February 16, 2022

Matt Kelley, Senior Planner
NEVADA COUNTY PLANNING DEPARTMENT
950 Maidu Avenue, Suite 170
Nevada City, California 95959-7902

IDAHO-MARYLAND MINE PROJECT
ENVIRONMENTAL IMPACT REPORT (EIR) EVALUATION

This letter demonstrates the technical background and expertise to clearly state that the **IDAHO-MARYLAND MINE PROJECT:**

Ind 707-1
- Has the potential to start an economic, health and environmental chain-reaction that can desolate this thriving community.

Ind 707-2
- Has the potential to degrade/destroy private wells, leaving homes and farms inhabitable by the end of the day.
- Cannot predict the number of well failures that will result in generations of families losing home, small business and farm values without the having the resources to move or rectify the situation.

Ind 707-3
- Is equal to the daily water use of 16,000 citizens.

Ind 707-4
- Has a 30-acre-foot clay-lined settling pond for heavy metals that borders an earthquake fault line.

Ind 707-5
- Has, in addition to toxic and hazardous processes, severe soil issues with erosion, permeability and expansion.

Ind 707-6
- Is equal to an additional 3,450 cars on the road, every day.

Ind 707-7
- Will have a constant stream of massive dusty trucks that will destroy the structural integrity of the pavement.

Ind 707-8
- Does not provide funds for the perpetual maintenance of street lighting, traffic signals or pavement.

Ind 707-9
- Will not provide street or other improvements to the community, but only pays a "fair share" with no other funding provided.

Ind 707-10
- Will, every day, use a ton of explosives to set-off 257 detonations.

Ind 707-11
- Will require a Mass Evacuation Plan for the community.

Ind 707-12
- Will probably follow the historic record and be abandoned in five years.

Ind 707-13
- Will only benefit and profit Rise Grass Valley, a private company, while robbing the community of Grass Valley of public resources, integrity and reliability.

Page 1

Matt Kelley, Senior Planner
NEVADA COUNTY PLANNING DEPARTMENT
IDAHO-MARYLAND MINE PROJECT
ENVIRONMENTAL IMPACT REPORT (EIR) EVALUATION
February 16, 2022

For over 40 years, I was employed as an engineering consultant. During my almost 20-year employment with a civil engineering firm, I found my niche. My area of expertise is not design. My expertise is in the areas of project analysis and evaluation, financing and implementation, and the maintenance of facilities in perpetuity. Incorporating in 1996, I headed a consulting firm for an additional 20 years. Following that time, for a 2-year transition period, I was employed as a principal consultant with an engineering firm, retiring in 2019.

During my career, all clients were various public agencies, counties, cities, municipal water districts, hospital districts, and fire protection districts. Representative is my work with a Southern California City with a rich history in the citrus and stockyard industries. The City evolved over the decades with a series of annexations that expanded the City by over 6,500 acres. These annexations allowed for residential, commercial and industrial development by providing major infrastructure for water, sewer, drainage, transportation corridors, and utilities. The intent was to aesthetically provide, in a sustainable manner, for anticipated growth crossing multiple drainage and water courses and transportation corridors. Public features such as fire stations, schools, parks, passive and active open space, golf courses, and fire buffer and fire protection zones were planned for and included.

Ind 707-14

Germane experience is further illustrated in the planned realignment and demilitarization of an US air force base. These actions included a 1,200-acre commercial/industrial development and a 236-acre healthcare campus requiring extensive demolition, the removal of hazardous materials, and the construction of major drainage and transportation facilities. These projects involved a variety of funding mechanisms for new construction, facility upgrades and conversion, as well as, for the perpetual maintenance of major flood control facilities, drainage areas, landscaping, street lighting, traffic signals, and streets.

My daughter, a teacher, and her husband, a therapist, own a home and work in Grass Valley. They have a young son and we look forward to more grandchildren in the future. When we can no longer manage the slice of paradise where we have lived for almost fifty years, my husband and I will join the family on their acreage in Grass Valley. Which is why I am involved, it's personal.

Listed at the end of this letter are my comments that correspond to Table 2-1, Summary of Impacts and Mitigation Measures, Chapter 2, of the EIR. Additional information referenced, in conjunction with this review of the EIR, includes the County's General Plan, population and employment data provided by the State of California's Employment Development Department, water use trends provided by the Legislative Analyst Office of the California Legislature's Nonpartisan Fiscal and Policy Advisor, Executive Reports issued by Division 5 of the State Water Resources Control Board and articles printed by the Union, the San Francisco Chronicle, CBS Sacramento, and the Atlantic.

Matt Kelley, Senior Planner
NEVADA COUNTY PLANNING DEPARTMENT
IDAHO-MARYLAND MINE PROJECT
ENVIRONMENTAL IMPACT REPORT (EIR) EVALUATION
February 16, 2022

In addition to the comments on Table 2-1, certain aspects of this controversy are discussed as follows:

1. In general, California State statute provides for and requires legislative bodies, in this case the County of Nevada, to establish a process for reviewing a property owner's proposed project. We are at the beginning of this process. Due to the significantly adverse social, economic and environmental ramifications of this project, it will be a lengthy certification process.

Ind 707-15

However lengthy, which I emphasize is due to the adverse nature of this project, and not the process itself, I am clear on proposing specific motions be taken by the County Planning Commission and the Board of Supervisors. Four Project Alternatives are presented for consideration in said Chapter 2. Following close of the Public Hearing on the Final EIR, the proposed motion to be taken by the Planning Commission would be to approve and recommend to the Board of Supervisor's adoption of Alterative 1, the No Project (No Build) Alternative. Following the Public Hearing to be held by the Board of Supervisors, I further advocate and recommend a motion by the Board giving final approval to Alternative 1, No Project.

2. During the course of 40 years, I have worked with many public agencies, property owners, corporations and other interested parties. Any difficulty can be surmounted if all members of the Project Team are honest about the risks involved and recognize the concerns of, and are responsive to, the community. I am disheartened by the cavalier attitude demonstrated by the property owner, Rise Grass Valley (RGV).

Ind 707-16

By soliciting certain groups and providing pre-printed support cards, RGV is actively working to rile-up and divide the citizenry. Grass Valley has a rich history and is multi-generational. The community protest against this project is spontaneous and crosses every economic, political, age, sex, race and divide you can find. Mr. Mossman, President of RGV, and RGV have shown a blatant disregard for the integrity of this community and is using the American flag to bully his way about town.

My kids know all their neighbors and felt joyous welcome when they moved here, pies included. With their neighbors, they have made it through scorching days, wildfires, heavy rains, heavy snows and weeks without water and electricity. Together. That is why we are investing in the community of Grass Valley, not to get rich and flash gold around.

Matt Kelley, Senior Planner
NEVADA COUNTY PLANNING DEPARTMENT
IDAHO-MARYLAND MINE PROJECT
ENVIRONMENTAL IMPACT REPORT (EIR) EVALUATION
February 16, 2022

3. In mentioning the American flag, I am wondering why the changes in the firm's structure and citizenship. In 2005, when RGV began purchasing aspects of this project, it was a company headquartered in Vancouver, British Columbia, Canada. RGV is now a local subsidiary and Mr. Mossman has changed his Canadian citizenship to American. He has indicated that he now lives and works in Grass Valley. There must be a reason to go to all this work and legal expense. Perhaps the reasons for these changes are for public relations, or taxes?

4. The EIR lists a projected workforce of 111 employees per shift, with a total of 312 employees. With two 12-hour shifts, a more reasonable estimate would be a total of 220 to 250 employees. The investment will be in machinery, not employees or improvements to the community. These are not secure jobs with unique potential or opportunity. A shut down or prolonged periods of inactivity are not unusual. The EIR clearly states, multiple times, there were many instances of inactivity during the 1866-1956 production periods. Due to the insurmountable difficulties and the negative impacts, shutdowns typically occur in the fifth year.

Ind 707-17

In many statements, Mr. Mossman has misrepresented the economic and employment prospects of the project. Misrepresentation includes the number of employees, the number of local hires, and the outlandish claim that over 300 additional community jobs will be created. This is irresponsible misrepresentation. Further misrepresentation has been made in statements regarding expansion of the tax base and new public spending in the amount of $50 million.

5. Mr. Mossman has often stressed the amount of money RGV has spent on this project. Any cost incurred by RGV has been their decision made for the benefit of RGV and not the community of Grass Valley. The County of Nevada has incurred no obligation to RGV. Future improvements will be to the benefit of RGV or as a result of the significant hazardous impacts of this project. RGV has never had this type of responsibility before, this being the first mine in the company's portfolio. The firm's earnings reports indicate this venture is short of funding.

Ind 707-18

Who goes into this type of project underfunded? IF RGV can't stand the heat, they should abandon a project they do not appear to comprehend. A firm going into the mining business should have the understanding of a capital intensive undertaking with many surprises and no guarantees. Mining is a business of starts and stops with unforeseeable delays and uncertain employment. The multiple risks this project brings to Grass Valley are unacceptable.

Matt Kelley, Senior Planner
NEVADA COUNTY PLANNING DEPARTMENT
IDAHO-MARYLAND MINE PROJECT
ENVIRONMENTAL IMPACT REPORT (EIR) EVALUATION
February 16, 2022

Ind 707-19

6. Long before RGV purchased the Centennial and Brunswick sites, it was recognized that historic mining activity had deposited or exposed natural occurrences of lead, arsenic, mercury and other metals at concentrations exceeding background soils metal concentrations and regulatory benchmark concentrations. In 2005, the Federal Environmental Protection Agency identified the Centennial Industrial Sire as a potential Super Fund Cleanup Site, and in 2018, confirmed that environmental remediation was necessary. Since purchasing the property in 2005, with full disclosure and an understanding of these hazards, RGV has been working with the California Department of Toxic Control (DTSC).

   Seventeen years later, no goals have been established, no cleanup activity has occurred, and no cleanup activity is scheduled to occur. Other than entering into a voluntary agreement twelve years ago with the DTSC, RGV has shown no intent or forward motion to commence action. RGV has not demonstrated, by any means, good faith efforts towards the environment of Grass Valley, preferring to play a shell game and stall for time.

Ind 707-20

7. Mr. Mossman has been quoted making comments such as, "Working in a mine now is like working in a residential community" and "There's no trade-off between the environment and jobs, we've designed it to have no impact on the environment".

   He also has the audacity to state that there isn't a problem with heavy metals where they are going to dig. How can Mr. Mossman make these statements when soils reports have indicated otherwise? It is well documented that there are health risks to the plants, animals, water, and humans at both the Centennial and Brunswick sites.

   There are already problems at the Brunswick site with more to come when the site is stripped of vegetation and the impact of prior mining activities is laid bare. As RGV digs around, at a depth of 5,000 feet within an underground area of 2,585 acres, we have no comprehension of the sink holes, landslides, flooding, and other issues that will be uncovered as we discover the impact of time and weather on the numerous uncharted abandoned mines that are known to exist.

   If an issue isn't recognized, it can't be solved or mitigated. Mr. Mossman prefers to deny and fails to recognize the significantly adverse social, economic and environmental ramifications of this project. Again, this firm has no experience in mining. RGV is not the firm to undertake mining activity, anywhere, let alone undertaking the dewatering that will need to occur 24/7 under this project.

Matt Kelley, Senior Planner
NEVADA COUNTY PLANNING DEPARTMENT
IDAHO-MARYLAND MINE PROJECT
ENVIRONMENTAL IMPACT REPORT (EIR) EVALUATION
February 16, 2022

8. With growth, there are consequences, and oftentimes a reckoning. In an attempt to prevent recessions, bankruptcies, delinquencies, inflation, and project abandonment, new projects are justifiably under independent scrutiny. Stressing the word independent, studies on market trends, absorption rates, economic analysis, and appraisals can be invaluable to public agencies. Some projects just don't pan out, especially over the long term.

   Just because there is gold, doesn't mean we need to or should go get it. Gold has historically been a highly volatile commodity, subject to world market conditions and government policy. There is a reason they call it gold fever, it is a sickness. It is tempting to romanticize the past mining activities. With rampant disease, filth and malnutrition, the water was so degraded it was necessary to put your laundry on a boat to China.

9. Grass Valley is recognized by the County as a Community Region. While the population has remained constant, income levels in the area have steadily increased. Unemployment rates tend to be lower than the state and national averages, with the current unemployment rate being around 3.7%.

Ind 707-21

As the kids get back in the school room, Grass Valley has every reason to have a positive outlook for the future. There are labor shortages for skilled labor to shore up the energy grid, internet, and other infrastructure. Young professionals have found possibilities and moved here with their families. The baby boomer generation is retiring and many are taking early retirement, opening more employment opportunity in the community. For example, when I retired, three Project Managers assumed my workload.

This project romanticizes the past and is a distraction the community doesn't need. Enough of the community and county's resources have been given to this project. I have yet to find a policy statement, an initiative, a justification, a referendum, or community desire for this project at these locations.

In the Sierras, there is a neighborhood that has been plagued by wildfires and power outages. That neighborhood is using thermal energy to power homes during times of power outages. Air quality is still lousy but they can stay in their homes, keep the wells pumping and the food cool. Grass Valley is also inventive and has many resources, especially their neighbors. Upon the Board of Supervisor's approval of Alternative 1, No. Project, the County can direct resources towards other projects that provide truly sustainable services and benefits to the community.

Thank you for the consideration of my comments. Please contact me for any further discussion.

/S/ Roxanne E. Shepherd, 2370 Edgehill Road, Vista, CA 92084-4824, (760) 390-0679,
roxshepherd4@gmail.com

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Matt Kelley, Senior Planner
NEVADA COUNTY PLANNING DEPARTMENT
IDAHO-MARYLAND MINE PROJECT
ENVIRONMENTAL IMPACT REPORT (EIR) EVALUATION
February 16, 2022

Roxanne Shepherd's Comments on
Table 2-1, Summary of Impacts and Mitigation Measures, Chapter 2, of the EIR

The public is aware of the significant adverse social, economic and environmental ramifications of this project. Public comments have been documented in the EIR. The intent is to highlight statements within the EIR and offer additional viewpoints.

Ind 707-22

Aesthetics (Section 4.1 etal) – No Comments

Agriculture and Forestry Resources (Section 4.2 etal) – No Comments

Air Quality and Greenhouse Gas Emissions (Section 4.3 etal) - With the occurrence of daily dramatic climate events and over forty pages on air quality and greenhouse gas impacts, the EIR finds these impacts to be LS, Less than Significant and LCC, Less Than Cumulatively Considerable. Truck hauling and rock grinding activities will take place 24 hours a day, 7 days a week. If RGV doesn't meet goals or incurs production delays, it can be assumed they will apply for a Limited Threat Discharge Permit (further discussed under Section 4.8) .

The EIR projects 118 maximum daily round trips (2 trips) for haul trucks and suppliers. In terms of actual impact (structural stress and mechanics), these huge vehicles easily equate to 15 cars per truck. Accordingly, these trucks equate to 3,540 daily car trips. Each dusty truck trip removes water and oxygen from the air and replaces it with particulates and toxins having a significant and unavoidable impact.

Ind 707-23

Once this project starts, it can't halt production. If there is a power outage, at a minimum, two 7,500-gallon trucks will need to deliver diesel to the facility on a daily basis. The daily baseline energy consumption of this facility is equal to 15,000 gallons of diesel fuel. This use does not include energy for the transportation of trucks and other vehicles in and out of the facility.

If the Board of Supervisors votes to approve any aspect of this project (Alternatives 2, 3 or 4), the Board will also need to adopt a Statement of Overriding Considerations explaining the decision to balance the benefits of the project against the unavoidable adverse impacts.

Biological Resources (Section 4.4 etal) – The EIR states that the impacts to the biological resources due to this project are LS, Less than Significant and LCC, Less Than Cumulatively Considerable. In order to reach this conclusion there are Transplant Monitoring Programs, Pre-construction Survey and Avoidance and Minimization Measures, Watercourse/Wetlands/Riparian Management Plans, and Habitat Management Plans with Habitat Enhancement and Conservation Easements for each species (four programs).

Ind 707-24

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These programs can entail growing endangered species from seed. Four programs will be prepared for the Pine Hill Flannelbush, the Foothill Yellow-Legged Frog, the Western Pond Turtle, the California Red-Legged Frog, the California Black Rail, the Coast Horned Lizard, Special-Status Bats, Non-Special Status Raptors and Migratory Birds, and any other plant and animal that will be disturbed by this project.

There appears to be no funding for these labor intensive plans. Unless these plans are fully funded and supported by community groups, they will fail. Lacking community involvement and sufficient fundin,g it can be anticipated that complaints will be made and they will be ignored to the point of distraction. Those that care will be ridiculed and nothing will get done. If these programs fail, the community's biological resources die. It has taken over 100 years to superficially recover from prior gold mining activity. There are still hazardous materials and discarded facilities in the County that can be considered ticking time bombs. There are no plans or actions proposed to rectify these issues.

Ind 707-25

Cultural and Tribal Cultural Resources (Section 4.5 etal) – No Comments

Geology, Soils and Mineral Resources (Section 4.6 etal) – The EIR has identified various loam soils types where construction is proposed to take place within the East Bennet Road ROW and the mining sites. These loam soils types, along with the sand and silt caused by prior mining activities, have been identified as having a severe high erosion potential. Samples indicate erosion is very likely to occur, with the hazard being a high, or a moderate to high, erosion potential. No areas have been identified as having a low potential for erosion.

A moderately slow rate of permeability (drainage) has been identified for these soils. Those areas containing clayey alluvial land have a moderately slow to a very slow rate of permeability. Expansive soils are characterized by their ability to undergo significant volume change due to a variation in moisture content. Expansive soils tests have established a moderate to high potential for expansive soils hazards that will affect the proposed improvements at all sites, especially the Brunswick site.

Ind 707-26

Physical closure is recommended for near surface features from prior mining activities that could become unstable, including three shafts, a drain and a tunnel. The site contains steep slopes gradients, 30% or greater, natural and manufactured, that allow for the leaching of toxic and hazardous materials.

This area lies within a Type C Fault Zone, with low seismicity, a low rate of occurrence and a moment magnitude of 6.5. The EIR assumes that since no historic seismic activity has been documented, there is no evidence the area is seismically active. However, the eastern shore of the 30-acre-foot clay-lined settling pond is adjacent and parallel to an unnamed north, northwest trending fault line. It is also noted that the fault line enters Wolf Creek which lies along and parallel to the south shore of the pond. This pond is to be used for water storage and surge capacity; and, for the settling and removal of total suspended solids, a significant portion being dissolved lead and manganese. The pond is scheduled to be cleaned-out every ten years.

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All design and construction will be under the guidance of the County's Mitigation Measures and Best Management Practices of the Management Plans for Steep Slope and High Erosion Potential. From an engineering perspective, in theory, the proposed design and paste backfill construction could work. However, the EIR states that an entire project-area baseline has not been established and existing conditions may vary and be worse than the given estimates. The EIR also acknowledges that the proposed activities and disturbances set forth under the Measures and Practices may actuals result in further damage to the community and environment. However, with subsurface drainage control, trenching, compacting, reinforcing, evacuating, stabilizing, and placement activities, the EIR states the S, Significance impacts will be reduced to LS, Less than Significant.

Problems arise during implementation and construction when the unexpected occurs. The energy and the resources required to be expended to support this project will be without limits. At what point, at what cost, is this project abandoned? Historically, the sites are abandoned after a five-year period.

Hazards and Hazardous Materials (Section 4.7 etal) - It has been well documented that historic mining activity in Grass Valley and the surrounding areas has deposited or exposed natural occurrences of lead, arsenic, mercury and other metals at concentrations exceeding background soils metal concentrations and regulatory benchmark concentrations. Until cleaned-up, the 56.4-acre Centennial Site is closed and remains an active treat in the middle of the Grass Valley Community. In addition to the existence of these hazardous materials, the EIR indicates the 119-acre Brunswick site has been used as a dump site.

Ind 707-27

The EIR acknowledges that a full survey of the 119-acre site has not been done. With the historic storage and use of petroleum, PCPs, pesticide and hazardous products, undocumented soil fill, refrigerators, undocumented drums, undocumented drainage structures, former transformers, and above-ground storage tanks, mine shafts, standing water, and suspect pits that litter the site, an adequate survey would be delicate, labor intensive and prohibitively expensive. The EIR further states that the location, status and total number of monitoring wells within the site is not definitely known.

Due to the toxic nature of the proposed activities, and the explosives that will be stored on-site, an Emergency Response and Evacuation Plan will need to be structured to provide evacuation strategies for the County's response to emergencies that involve the mass evacuation of people and animals from an impacted area.

Under the EIR, the mine operator and the RGV employees will be monitoring and certifying that the S, Significance Impacts of this hazardous project will be reduced to LS, Less than Significant.

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Ind 707-28

Hydrology and Water Quality (Section 4.8 etal) – Reference is made to Figure 4.8-4, Map of Domestic Supply Wells and Underground Mine Workings, of the EIR. An "as of" date is not given for the Map and new wells are daily being installed. There is a realistic six-month backlog of new well requests in the area. The reliance on wells illustrated on this Map is sufficient basis for the approval of Alternative 1, No Project.

If this project moves forward, it should be anticipated that RGV will apply for a Limited Threat Discharge Permit. This will allow **unlimited** amounts of discharge subject to **quarterly** monitoring at a specified site by the State Water Resources Control Board (SWRCB).

Grass Valley annually experiences 65 rainy days with an average rainfall of 55 inches. Leaching takes place when it rains. To be effective, reporting should be required after every rain and wind event. To know there are "adequate above- and below-drainage structures" is not the point. The point is that water will go through the treatment plant, through the 30-acre foot waste settling pond, and into Wolf Creek.

Any proposed action in the EIR that simply monitors the impact is not true mitigation. As with all public agencies, Division 5, SWRCB has casework overload further aggravated by COVID. For the period of July 1 to December 31, 2021, 57 facilities (42%) of the 151 target facilities were inspected. The number of non-target facilities was not listed in the SWRCB Executive Report. Years can go by without a State or Federal inspection while discharges of over 250,000 gallons per day, are allowed. Although presented otherwise, the proposed actions set forth in the EIR do not adequately reduce the significant and unavoidable impacts of this project.

The hydraulics and hydrology of this project are very complicated. As water levels fluctuate on a project of this size, the actual stress on the existing infrastructures will not be known until breakage occurs. The ramifications of massive well failures would be devastating. Rural irrigation districts are not typically designed to meet high demand and can be plagued by maintenance issues that affect water reliability, insurance rates, and the financial ability to move beyond merely placing band-aids on the system. Should this occur, funding and liability is not addressed in the EIR.

Private wells are the backbone of this community. If well failure occurs, a home becomes inhabitable within hours. This project has the potential to start an economic, health and environmental chain-reaction that can desolate this thriving community. The EIR states that this project is located in two watershed areas and will substantially degrade surface and ground water quality; impede sustainable ground water management of the water basins; extensively alter existing drainage patterns resulting in erosion, flooding; impede and redirect flood flows; and, pollute. It is astonishing these facts are not considered in the EIR to be significant and unavoidable. When digging thousands of feet below the ground water level, the pumps removing the water cannot stop. Water will be constantly sucked out of the ground (dewatering) and poisoned before discharge in Wolf Creek.

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However, the EIR finds that, because there are management and monitoring plans, all of these impacts are reduced to LS, Less Than Significant.

It is noted that water usage is discussed under Section 4.11, Public Service and Utilities.

Ind 707-29

Land Use and Population and Housing (Section 4.9 etal) – An EIR can set a project's trajectory. This EIR inadequately protects the environment and its citizenry. In order to avoid setting any precedent for this project's forward motion, is recommend that the Board of Supervisors deny approval of the EIR. Over time, these impacts are compounded and expand into new long-term negative impacts. Due to a lack of adequate REM sleep, what is a noise problem can becomes a concentration and behavior issue at home, school or work..

Ind 707-30

Noise and Vibration (Section 4.10 etal) – Every day, for 80 years, this project can use a ton of explosives to set off 257 detonations. Approximately 500 tons of barren rock and 1,000 tons of mineral rock will be ground every day, for 80 years. As previously stated, every day, this project will equate to an additional 3,540 cars on the road.

The EIR acknowledges that the current noise level in the Grass Valley Community is already S, Significant. The EIR finds that the noise impact of this project will be SU, Significant and Unavoidable.

Ind 707-31

Public Services and Utilities (Section 4.11 etal) - Fire protection and emergency services, police for the security of hazardous and explosive materials, water supply, wastewater, solid waste, electricity and gas, are all community resources that will be used to support a project that benefits a private company. These facilities have been paid for and maintained by the citizens of the community. However, The EIR considers the impact of this project on public service and utilities to be N/A, Not Applicable.

The EIR states that water usage per day for this project will be 5,700 gallons per day (gpd) of potable water for sinks, toilets and showers; 42,000 gpd of non-potable water for dust suppression and compaction; 84,000 gpd of groundwater during operations; and, once dewatering is complete, 1.2 million gpd will be pumped to the surface for treatment, totaling 1.4 million gpd of water use. The typical person in this area consumes for inside and outside water purposes, an annual average of 85 gpd. In water alone, this project will consume an amount that would serve almost 16,000 people every day.

Ind 707-32

Transportation (Section 4.12 etal) – Under all scenarios, the proposed project would increase traffic through intersections already identified by CALTRANS as already operating under unacceptable conditions. As proposed, conditions only worsen along the 24 identified streets and intersections. The project will fund what is termed a "fair share contribution" to bring transportation operations to an acceptable level. The determination of fair share contribution is not based on benefit, but rather the percentage of access upon a route. For example, a project may be required to fund 8% of a specific traffic signal.

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The EIR states that because the remaining funds of the improvements are unknown, in terms of timing and contributing parties, the successful implementation of the improvements is uncertain. The result of the fair share contribution will be that inadequate funds are collected and no improvements will be made to the transportation system.

Ind 707-33 The construction and maintenance of pavement, lighting and signalization along transportation corridors is extortionately expensive. The coordination of traffic signals is highly technical, expensive and the results are seldom worth the cost and headache.

Ind 707-34 The daily impact of this project will be equal to 3,450 cars driving by. The EIR infers that once a vehicle trip is counted, it exists and should not be counted as an increase the following year. Yet the impact of these heavy trucks on the pavement occurs with every trip, regardless of the number of years. The cumulative impact on pavement, lighting and signalization caused by this project will be immeasurable. When it is hot and a truck comes to a stop, the pavement is folded underneath, like a fault line. The pavement thins and then builds up in layers. Big-box warehouses, with high truck traffic, are causing pavement buildup in certain older areas, like Grass Valley, that is affecting drainage and the structural life and integrity of the pavement. When you add the steep slopes, the dust, the wind, ice, and rain, these trucks are going to literally rip up and degrade the streets. After the first year, this impact will not only exist, it will compound. For an EIR to judge that an impact does not exist because it was already there after the first year of production is ludicrous.

The EIR states that the negative impacts related to transportation, **even if all the improvements actually are constructed,** the majority of the impacts remain SU, Significant and Unavoidable.

Ind 707-35 **Wildfire (Section 4.13 etal.)** – The EIR finds that this project, with abatement programs and fire extinguishers, poses an LS, Less Than Significant threat to wildfires. With the razing and explosive nature of fires experienced in Redding and Paradise, Grass Valley is already on alert year round. There is no justification for the risk this project poses to Grass Valley. If the facility can't shut down, should a fire occur, who has the priority of the water first? Due to its hazardous nature, water from the mine can't be used for fire abatement.

The EIR finds this project has an LS, a Less Than Significant impact on the threat of wildfire to the community of Grass Valley.

"There is no long a fire season; there is a world-wide fire year". This comment was made by an Orange County firefighter battling urban wildfires in February, 2022.

INDIVIDUAL LETTER 707: ROXANNE SHEPHERD

Response to Comment Ind 707-1
The commenter states that project will lead to a chain-reaction of economic, health, and environmental impacts that will desolate the community. Regarding economic impacts, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-2
The commenter states the project will degrade or destroy private wells and that the DEIR underestimates the number of potentially impacted wells. The commenter is referred to Chapter 4.8 of the DEIR which found that impacts to groundwater supplies would be less than significant. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 707-3
The commenter states that the project's water use is excessive. The commenter is referred to Chapter 4.8 and the Water Supply Assessment in Appendix N of the DEIR.

Response to Comment Ind 707-4
The commenter is concerned that the clay-lined settling pond allegedly rests on an earthquake fault. The DEIR states that over 150 years of observation has produced no records of movement in Grass Valley area mines. (DEIR, p. 4.6-31.) As discussed in Chapter 4.6-1 of the DEIR, based upon substantial evidence in the record, the project includes a request to amend the Final Map for Bet Acres recorded in February 1987 in Book 7 of Subdivision Maps at Page 75 to remove the "200' Building Setback From Fault", as shown on Sheet 4 of Final Map #85.

In addition, a management plan was prepared pursuant to Nevada County LUDC Section L-II 4.3.8 to address potential seismic hazards associated with the previously identified inferred fault alignment. It is NV5's professional opinion that the subject fault, identified on the property in Map 85-7, does not qualify as a seismically active area as defined by Nevada County LUDC Section L-II 4.3.8.B, and the proposed project development within the designated building setback fault zone is generally feasible from a geotechnical engineering standpoint. (DEIR, p. 4.6-31.)

While the analysis shows that an active fault (activity within 11,000 years) likely does not exist, out of an abundance of caution, the County has concluded that a significant impact could occur without mitigation. Mitigation Measure 4.6-1 requires that prior to approval of Improvement Plans, the design recommendations from the Brunswick Industrial Site Geotechnical Report (November 18, 2019) shall be incorporated into the Plans to the satisfaction of the Nevada County Building Department.

Response to Comment Ind 707-5
The commenter states that the project has severe "soil issues with erosion, permeability, and expansion", but provides no additional information on which to formulate a response. The commenter is referred to Chapters 4.6 and 4.8 of the DEIR.

Response to Comment Ind 707-6
The commenter states that the project will result in an additional 3,450 cars on the road per day but provides no evidence to substantiate this claim. The commenter is referred to the traffic impact analysis in Chapter 4.12 of the DEIR.

Response to Comment Ind 707-7

The commenter states that the project's use of haul trucks will destroy the pavement. The DEIR analyzes impacts to pavement in Chapter 4.12. Specifically, the DEIR requires the Project Applicant to enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impacts to pavement. (DEIR, Mitigation Measure 4.12-6(b).)

Response to Comment Ind 707-8

The commenter states that the project would not provide funds for the perpetual maintenance of street lighting, traffic signals, or pavement. As discussed in Response to Comment Ind 707-7, the DEIR requires the Project Applicant to enter into agreements with Nevada County or Grass Valley to provide the project's fair share funding for applicable improvements. (DEIR, 4.12-67, 91.)

Response to Comment Ind 707-9

The commenter states that the project will not provide street or other improvements to community. The commenter is referred to Responses to Comments Ind 707-7 and Ind 707-8. Additionally, various required traffic improvement fees and fair share payments for intersection improvements are discussed in Chapter 4.12 of the DEIR.

Response to Comment Ind 707-10

The commenter states that the project would require 257 detonation per day. The DEIR analyzed the project's use of explosives and found the impact to be less than significant after implementation of Mitigation Measures 4.7-1(a-d). (DEIR, 4.7-22.)

Response to Comment Ind 707-11

The commenter states the DEIR requires a mass evacuation plan. The project does not require a mass evacuation plan for the community. The commenter is referred to Chapter 4.7 of the DEIR, which discusses Nevada County's emergency response and evacuation procedures. (DEIR, 4.7-10.)

Response to Comment Ind 707-12

The commenter states the project will likely be abandoned in five years. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-13

The commenter states that the project will only benefit the Project Applicant. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-14

This comment is introductory in nature and does not discuss the adequacy of the DEIR. The comment is noted.

Response to Comment Ind 707-15

The commenter is opposed to the project and prefers that the County selects the "No Build" Alternative to the project. The commenter's opposition to the project is noted. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 707-16

This comment discusses the Project Applicant, it does not discuss the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 707-17

The commenter states the Project Applicant misrepresents the employment benefits derived from the project. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-18

This comment discusses the Project Applicant, it does not discuss the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-19

This comment discusses the Project Applicant and prior projects at the Brunswick and Centennial Industrial Site. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 4 - Cleanup Project is a Separate Project Under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Ind 707-20

The commenter states that the Project Applicant understates the environmental and economic impacts of the project and makes references to heavy metals at the project site and associated impacts to plants, animals, water, and humans but provides no additional detail on which to formulate a response. Regarding economic impacts, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts. The commenter is also referred to Master Response 3 - Operator Responsibility.

Regarding the risk heavy metals pose to plants animals, water and humans, the commenter is referred to Chapters 4.3 and 4.8 of the DEIR, Master Response 20 - Conservatism of Metals Assumptions, and Master Response 8 - Mine Waste Characterization.

Regarding the risk of “sinkholes” and landslides, please see Chapter 4.6 of the DEIR. The commenter is also referred to Master Response 29 - Near Surface Workings.

Response to Comment Ind 707-21

This comment discusses social and economic impacts of the project and does not discuss the adequacy of the DEIR. The commenter is refereed to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-22

The commenter offers no comments on Chapters 4.1 and 4.2 of the DEIR. The comment is noted.

Response to Comment Ind 707-23

The commenter references several components of the project regarding impacts to air quality but does not comment on the adequacy of the DEIR. A limited threat discharge permit is required before mine dewatering commences. The commenter is referred Master Response 35 - Discharge to South Fork Wolf Creek. The DEIR analyzes air emissions in Chapter 4.3 of the DEIR. The project’s significant and unavoidable impacts are summarized in Chapter 5.6 of the DEIR.

Response to Comment Ind 707-24

The commenter states that mitigation measures in Chapter 4.4 of the DEIR will fail unless they are fully funded and supported by community groups and that complaints will be ignored. A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 - Operator Responsibility.

The commenter says that there are hazardous materials and discarded facilities in the County and no plans or actions are proposed to rectify these issues. The DEIR analyzes the proposed project impacts and does not analyze other sites or projects.

Response to Comment Ind 707-25

The commenter does not have comments regarding Chapter 4.5 of the DEIR. The comment is noted.

Response to Comment Ind 707-26

The commenter states that the type of soil present at the Brunswick site poses stability hazards for the project. The DEIR's Chapter 4.6 analyzes the geotechnical aspects of the project and found related impacts to be less than significant after mitigation. In regard to leaching of toxic and hazardous materials from the slopes, the commenter is referred to Master Response 8 - Mine Waste Characterization. Regarding the fault adjacent to the water treatment pond, the commenter is referred to Response to Comment Ind 707-4. Regarding economic impacts, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-27

The commenter states that both project sites contain historical contamination but does not identify any inadequacies with the DEIR. The commenter also states that the project requires an evacuation plan due to the storage of explosives. Regarding the Centennial site cleanup, the commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.

As stated on page 4.7-35 of the DEIR, implementation of the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment, specifically related to elevated arsenic levels in the existing mixed soil and rock fill beneath the southeastern paved area of the Brunswick Site, should the area be disturbed as part of the proposed project, potentially encountering contaminated soils, the potential presence of petroleum contaminated soils, and the presence of monitoring wells. As a result, impacts would be considered significant. Implementation of the mitigation measures 4.7-2(a) through 4.7-2(c) would reduce the above potential impact to a less-than-significant level. The commenter is also referred to Master Response 10 - Explosives, Reagents, and Brunswick Fill.

An Emergency Response and Evacuation Plan for mass evacuation specifically related to project activities is not required. The commenter is referred to Chapters 4.7 and 4.13 of the DEIR.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 707-28

Regarding impacts of the project to domestic water wells and groundwater quality, the commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

The limited threat discharge permit is required before mine dewatering commences. Water is treated before discharge and is placed first into the water treatment pond and then into the water treatment plant and is discharged to South Fork Wolf Creek. The project would have a less than significant impact to water quality in surface waters or South Fork Wolf Creek. The commenter is referred Chapter 4.8 of the DEIR and Master Response 35 - Discharge to South Fork Wolf Creek.

Regarding impeding or redirecting flood flows, erosion, and flooding, the commenter is referred to Chapter 4.8 of the DEIR. The DEIR includes mitigation measures to mitigate the project's impacts to all of the aforementioned topics.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Regarding economic impacts, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-29

The commenter states the DEIR is inadequate without any additional detail. The commenter's unsubstantiated opinion is noted for the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues. The commenter states that the project will have adverse noise impacts causing sleep disturbances. The commenter is referred to Response to Comment Grp 21-130.

Response to Comment Ind 707-30

The commenter is concerned about the impacts of blasting associated with the project but does not provide additional detail. Blasting vibrations have been analyzed in Chapter 4.10 of the DEIR and are less than significant after mitigation. The commenter reiterates the concern with traffic-related impacts. Traffic impacts are analyzed in Chapter 4.12 of the DEIR. The commenter states the DEIR acknowledges noise impacts from the project are significant and unavoidable. The construction noise from the installation of the potable water pipeline in East Bennett Road is considered Significant and unavoidable (DEIR, p. 4.10-30.) All other construction noise and noise during operations would be less than significant after mitigation. The commenter is referred to Chapter 4.10 of the DEIR.

Response to Comment Ind 707-31

The commenter states the project will require an increase in emergency services. Impacts to public services and utilities are analyzed in Chapter 4.11 of the DEIR. The DEIR found that impacts to public services and utilities would be less than significant. (DEIR, p. 4.11-21, 26, 28, 29, 30, and 31.) The DEIR also found that sufficient water supplies are available for the project. (DEIR, 4.11-35.) The commenter is also referred to Chapter 4.8 of the DEIR and the Water Supply Assessment in Appendix N of the DEIR.

Response to Comment Ind 707-32

The commenter states that the project will result in adverse traffic-related impacts and that the fair share contributions of the Project Applicant will be inadequate. As stated on page 4.12-98 and

4.12-103 of the DEIR, NCTC removed the SR 174/Brunswick Road intersection from their RTMF program in their 2016 Nexus Study, while Caltrans has the intersection identified as a planned, but unfunded improvement in their SR 174 TCR. Mitigation Measure 4.12-1(b) requires the Project Applicant to enter into a traffic mitigation agreement with Caltrans and provide the project's fair share contribution toward the improvements needed to improve intersection operations to an acceptable level. Because the remaining funds for the intersection improvements are unknown, in terms of timing and contributing parties, the successful implementation of the intersection improvements is uncertain. Therefore, the project's incremental impact to the SR 174/Brunswick Road intersection is considered significant and unavoidable in the DEIR. (DEIR, p. 4.12-93.)

Response to Comment Ind 707-33

This comment does not pertain to the adequacy of the DEIR. The comment is noted.

Response to Comment Ind 707-34

The commenter states that the impact of the project is equal to 3,450 cars driving by but provides no calculations or information as to the relevancy of this statement. The commenter states that traffic impacts are immeasurable. However, traffic impacts are analyzed in Chapter 4.12 of the DEIR and are based on numerous measurements such as traffic counts and traffic modeling. Various impacts from project traffic to certain intersections are less than significant, less than significant after mitigation, or in the case of SR 174 / Brunswick Road and Brunswick Road/Sutton Way, significant and unavoidable. The commenter is referred to Chapter 4.12 of the DEIR.

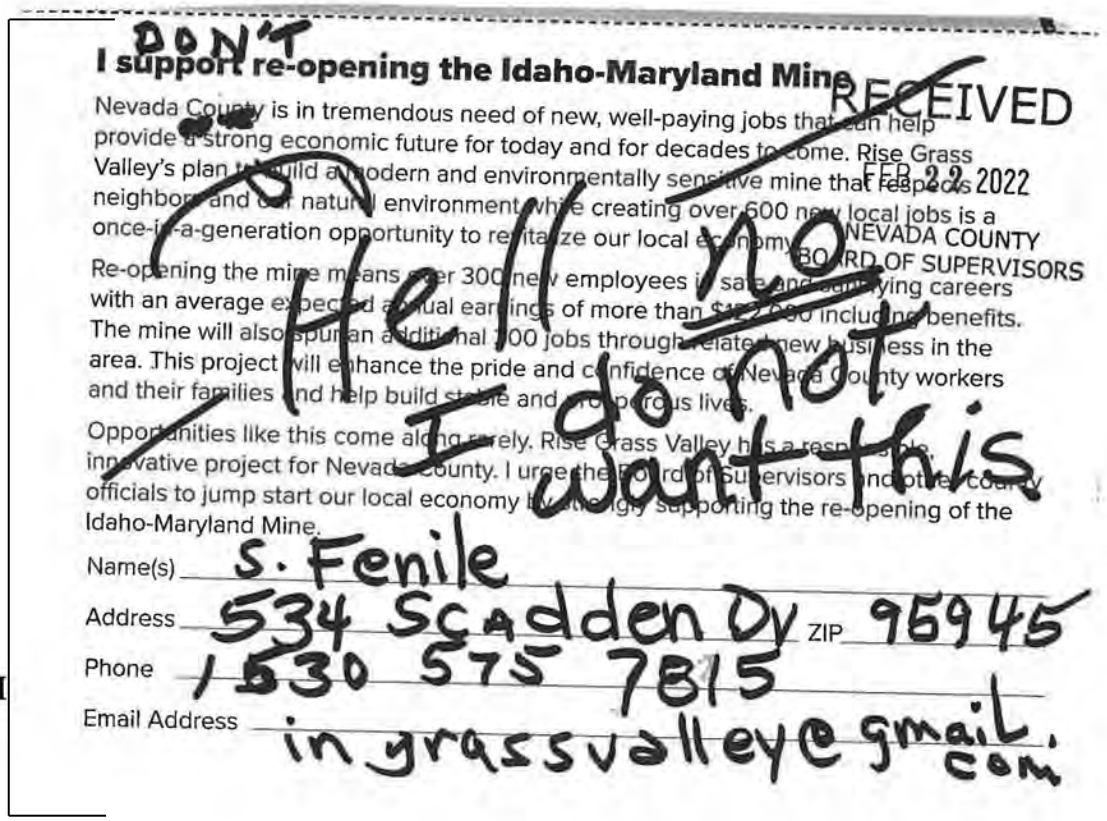
Impacts to pavement are discussed on pages 4.12-85 through 4.12-86 of the DEIR. Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

Response to Comment Ind 707-35

The commenter states that water from the mine cannot be used for fire abatement. However, the project treats mine water (see Master Response 35 - Discharge to South Fork Wolf Creek) and has several connections to NID fire service water (DEIR, p. 4.13-20.)

As stated on page 4.13-22 of the DEIR, the Centennial and Brunswick Industrial Sites have limited steeply-sloping topography that is known to exacerbate wildfire risk and spread. Prevailing wind conditions within the surrounding area are from the North-East and South-West directions, both of which have forest lands. The incorporation of defensible space around proposed structures at the Brunswick Industrial Site, as well as designing buildings in conformance with Chapter 7A of the CBC, would help to slow the spread of wildfire moving through the area. In addition, proposed improvements at both Sites would reduce the vegetation fuel load in the area. Nevertheless, vegetation would remain on both Sites and would need to be managed on an ongoing basis. In addition, use of hydrocarbon-powered heavy-equipment on-site could exacerbate wildfire risk. Without implementation of a vegetation management plan, the proposed project could have a significant impact related to exacerbating wildfire risks, and thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Implementation Mitigation Measure 4.13-2, requiring a comprehensive vegetation management plan, would reduce this impact to less than significant.

Individual Letter 708



DON'T
I support re-opening the Idaho-Maryland Mine

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $[illegible],000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Hell no
I do not
want this.

Name(s) S. Fenile

Address 534 Scadden Dr ZIP 95945

Phone 1530 575 7815

Email Address in grassvalley@gmail.com

Ind
708-1

Dist 3

INDIVIDUAL LETTER 708: S. FENILE

Response to Comment Ind 708-1

The comment does not address the adequacy of the DEIR, but rather expresses opposition to the proposed project. Please see Master Response 1.

Individual Letter 709

From: Sandy Bacon <sandybacon@sbcglobal.net>
Sent: Sunday, April 3, 2022 8:46 PM
To: Idaho MMEIR
Subject: Idaho-Maryland Mine

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Ind 709-1 I am writing about the impact the Idaho-Maryland Mine would have on us (the neighbors) that live in the area. I live 1.5 miles from the mine site and 2 miles from the dumping site on Centennial Drive. We are on a well and have no access to any other water. We cannot get NID. If the mine dewatering contaminates or dries up our well, what would we do? The spokesman for Rise Gold said "our water might taste funky and be cloudy but would still be acceptable". Acceptable to who?

Ind 709-2 My family moved here forty years ago to be near relatives and the beauty of Nevada County. My ancestors were Cornish miners here in Grass Valley. I value our heritage but re-opening the mine and the environmental impact it will have on our community is a huge mistake and one that will permanently damage our beautiful county. People live here and visit here for the peaceful beauty. How does a mine with its toxic mine waste, air pollution and noise pollution fit into the lifestyle of Nevada County. Not to mention the blasting underground in an area that has earthquakes or the dumping of minewater into our creeks.

Ind 709-3 We also have to look at the history of Mr. Mossman and his gold mining operation in British Columbia. He ran leaving massive environmental damage and law suits. Do we really think he would not do the same in our county if things got difficult.

Thank you,

Sandra Bacon

1

INDIVIDUAL LETTER 709: SANDRA BACON

Response to Comment Ind 709-1

For the commenter's well impact concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 709-2

The comment does not address the adequacy of the DEIR, but rather expresses general concerns about the proposed project. Please see Master Response 1. For toxic mine waste concerns, please see Master Response 8 – Mine Waste Characterization; for the generally noted air pollution concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; for generally expressed noise and blasting concerns, please see Chapter 4.10, Noise and Vibration; and for dumping of mine water into creek, please see Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 709-3

Please see Master Response 3 – Operator Responsibility.

Individual Letter 710

Matt Kelley
Senior Planner
County of Nevada
Community Develop Agency
950 Maidu Ave, Ste 170
Nevada City, CA 95959-8617

February 20, 2022

Re: Idaho-Maryland Mine Project Draft EIR, SCH # 2020070378

Mr. Kelley,

I am responding with a few of my concerns regarding the DEIR for the Idaho-Maryland Mine Project and its potential impacts on the residents of Nevada County.

Ind 710-1

#1: The current zoning of the land appears to be Light Industrial, M1 which is defined as "For the production, repairing, distribution, and warehousing of goods and equipment, along with support businesses and services. Uses should provide for buffering from adjacent land uses to minimize incompatibility and should have convenient, controlled access to arterial or major collector roads without passing through residential areas.
The zoning indicates that "Any other intensive industrial use not allowed in the BP or M1 Districts" are Not Permitted.

The access between the Idaho-Maryland and Centennial sites is along rural, residential zoned properties, contrary to the Light Industrial zoning. Mining, with the subsequent blasting, rock crushing, and hauling certainly seem to be an 'intensive industrial" use, which is not permitted for the sites.

These two items should be included within the list of impacts which can not be mitigated.

Ind 710-2

#2: The abandoned mine tunnels have created paths for water flow for decades that residents in the watershed of the mining property have come to rely upon. If the tunnels had not been created, or they had been continuously dewatered since their inception, water which now serves other properties potentially miles away from the tunnels would have failed to obtain water reliant upon this water. The owner of the mineral rights owns the minerals, but do they have the right to divert this water for non-beneficial uses (dumping into a creek) when an unknown number of properties rely on this water source?

Ind 710-3

The DEIR addresses that "Under existing conditions, the effect of this drawdown is limited to the East Bennet Road area." (Page 4.8-54, second paragraph). This seems a grossly oversimplified conclusion that does not account for the distance that underground water can travel. Page 3-15, fourth paragraph, indicates that static levels of groundwater is 260' below ground surface. That static level is taken at an elevation of ~2700'. This needs clarification as to how drawdown at this elevation, with such a low static level of ground water, could not affect properties below 2700' elevation that may be served by that same groundwater.

#3: Blasting underground can disrupt and forever change the fractures that homeowners downstream rely on to transport the underground water to their wells. Information within the DEIR that addresses the potential alteration of existing rock fractures that transport underground water does not seem to be sufficient or the potential impact to houses and communities reliant upon these groundwater sources.

Ind 710-4

Page 4.8-48 indicates that 'new mining activity would all occur at depths that are comparable to or much deeper than the historic mine workings." Thus, any blasting will be occurring below existing fractures which deliver water to residents well below the location of the mine. Again referring to the DEIR indications that static water is at 260', that is an area of rock formation and fractures that could be as much as 1000' in depth that could be impacted by blasting. The potential footprint of properties within the zone can't be estimated if there is not an accurate map of the underground aquafers and watercourses. The DEIR needs to include the potential impact to properties well beyond the mineral rights boundaries.

The DEIR needs to exponentially expand its scope of impact to wells within the region not just within the mineral rights.

Ind 710-5

#4: California is already experiencing insufficient energy production and availability compared to demand during heavy use periods. Pacific Gas and Electric Company has announced plans to move their residential customers to time of use rate schedules to encourage less energy usage during the hottest part of the day. The DEIR is lacking in any options for including renewable energy within the scope of the project to reduce the impact of the significant energy proposed to be used by the project.

A project alternative utilizing renewable energy sources should be included within the DEIR.

Ind 710-6

#5: The DEIR is working off assumptions regarding the Centennial Site and eventual cleanup of the site. Even if the site is cleaned up and the Department of Toxic Substance Control (DTSC) issues a No Further Action letter, there are still ongoing requirements for sites where the toxic substance is not removed from the site to a remote disposal location. Since that process is still moving forward with California DTSC the stipulations, land use covenants and Operations and Maintenance Agreements are unknown at this time. Per page 1-7, second to last paragraph "...even if the Centennial Clean-Up Project is not completed within the term of the mining permit,...in which case, material from the Idaho-Maryland Mine Project would not be placed on the Centennial Site.".

Since many of the figures and calculations are based upon the use of the Centennial Site, this DEIR needs to either be postponed until the actual available level of use of the Centennial Site is known or the use of the site should be excluded as part of the project. Either the Centennial site is part of the project, which should then incorporate the cleanup as part of the project, or the Centennial site is not within the scope of the project and all calculations on GHG emissions and other assumptions regarding availability of the Centennial Site need to be removed from the DEIR.

Ind 710-7

#6: Regarding the Water Treatment Plant and pond, the DEIR needs to have additional information on how the level of the pond will be regulated to prevent emergency overflows into South Fork Wolf Creek, if there are alternatives to dumping the water into South Fork Wolf Creek, and whether the levels of water introduction into South Fork Wolf Creek will have an adverse effect on downstream properties during storm events.

Per page 3-15 the clay-lined pond will have a capacity of approximately 40 acre feet (40 af). Per page 3.17 the pond will have an approximately 30 af working capacity. If the mine is to be dewatered at 2,500 af in a 6 month period (page 3-15), that is equivalent to 13.66 af per day. At 13.66 af per day that only provides a capacity of 2.15 days for the pond. This brings up concerns which should be addressed within the DEIR regarding:
a) What is the settling rate is for the water and how fast is the water treated and released?
b) What happens of the Water Treatment Plant is shut down for any length of time? Will the pond overfill and flow into South Fork Wolf Creek or is there an emergency shut-off that halts mine dewatering to protect the creek?
c) Will the Water Treatment Plant be staffed by a licensed Treatment Plant Operator 24/7 to address any emergencies and monitor the systems?
d) If backwash material is to be placed into the same pond, this will further reduce the capacity of the pond, shortening the period of time that water can be pumped into the pond.

Ind 710-8

The numbers used to discuss dewatering are inconsistent. At one point, the DEIR indicates 2,500 acre-feet of water will be removed over a 6 month period. At another the DEIR indicates that 5.6 cubic-foot-seconds (cfs) will be removed. That is a difference of 433 af of water. During the extreme drought conditions California is currently experiencing, clear water impact information is even more important.

Ind 710-9

The DEIR needs to have a more precise and consistent reference to the water amounts to be removed from the mine both before and during operation should be provided, using a consistent unit of measure, or provide a table showing acre-feet, cubic foot/second, and gallons per minute per day for each type of event to clarify water usage.

Ind 710-10

The DEIR should also address treated water discharges into the creek during abnormal rain events. While the DEIR addressed surface run-off analysis, with treated water discharges being estimated from 1.9 cfs to as high as 5.6 cfs, which are NOT part of the surface runoff analysis, there needs to be additional research and alternatives to treated water discharges into the creek during storm events.

Ind 710-11

The DEIR did not discuss opportunities for beneficial use of the water from dewatering the mine. There should be a discussion on opportunities to re-introduce the treated water back into the ground, either through storage or tapping into an underground aquifer.

Ind 710-12

The DEIR should discuss the possibility of another event such as what occurred at the Siskon Mine in North San Juan. What would be the ramifications of hitting an underground 'river', how would the overflow of water be mitigated? Are there tools available to help prevent such an event from occurring at this site? North San Juan has a significantly lower population than the Grass Valley area where the Idaho-Maryland Mine is located. The footprint of dewatering a major underground 'river' could impact properties for miles.

Ind 710-13

#7: Within the Summary of Impacts and Mitigation Measures:

I would request that the determination of LCC (less than cumulatively considerable) be reviewed for Impact 4.2-6. Nevada County already has numerous days where the pollution from the valley impacts our area, raising the AQI numbers to unhealthy levels. How can the increase of the levels of GHG being estimated by this size and longevity of this project not be a significant impact with needed mitigations?

3 | Page

Ind 710-14

The determination of 4.3-9 (Results in the inefficient or wasteful use of energy or conflict with a State or local plan for renewable energy or energy efficiency) as being Less than Significant is not consistent with the findings within the DEIR. The project is a huge net energy user during a period when State and local governments are requiring more renewable energy usage and less consumption. The project destroys Nevada County's energy use goals and that should be addressed to bring the project within the County and State goals.

Ind 710-15

I also object to the findings of 4.7-5 and 4.8-6 as less than significant. All these findings need to be reviewed and more fully discussed as to their impact over a span of 80 years.

Ind 710-15

Why are the mitigations for construction only? This project has an 80-year expected life-span. Mitigations need to be ongoing for all aspects of the project and should include the potential to replace equipment run on petroleum products with alternatives that will lessen the 80-year cumulative impact on the environment and the community.

Ind 710-16

Thank you for the opportunity to comment on this DEIR. I am by no means an expect on review of such documents, but this draft appears to have numerous areas that have not been addressed at all or the focus has been on meeting the letter of the law as opposed to the actual environmental impact upon the community, as evidenced by the number of project comments that have been deemed less than significant and not worthy of further discussion. I trust that more expert eyes then mine will point out many more of these deficiencies so that Nevada County can have a complete EIR, with adequate discussion that is representative of the valid concerns of the region and its citizens.

Sandra Hewston
19919 Casa Loma Drive
Grass Valley, CA 95945

INDIVIDUAL LETTER 710: SANDRA HEWSTON

Response to Comment Ind 710-1

The commenter states that the current zoning of the project site does not allow for mining. As discussed on page 4.9-16 of the DEIR, Subsurface mining is allowed in all base districts subject to approval of a Use Permit. Surface access to subsurface mining, including vent and escape shafts, is allowed in the AG, FR, M1, M2, P, and PD base districts subject to approval of a Use Permit. Surface mining is allowed in the AG, FR, M1, M2, P, PD, and TPZ Districts and where the property is zoned ME, subject to approval of a Use Permit and Reclamation Plan.

Response to Comment Ind 710-2

The commenter states that residents situated in the watershed depend on the groundwater in the Idaho-Maryland Mine to supply private wells. Water present in the underground mine workings does not supply domestic water wells. Rather the regional groundwater flow supplies domestic water wells. Impacts to domestic water wells from mine dewatering has been analyzed in the DEIR. The DEIR found that the project's impacts to groundwater supplies from the dewatering of the mine would be less than significant. (DEIR, p. 4.8-54.) The commenter is referred to Chapter 4.8, Appendices K.2 and K.3 of the DEIR.

Response to Comment Ind 710-3

The commenter states that the DEIR underestimates the number of private wells potentially impacted by the dewatering of the mine. As stated on page 4.8-19 of the DEIR, the static water level in the New Brunswick shaft and underground mine workings is approximate 2,497 feet msl to 2,502 feet msl. Regarding impacts to domestic water wells, the commenter is referred to Chapter 4.8, Appendices K.2 and K.3 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 710-4

The commenter states that the DEIR underestimates the scope of the impacts to groundwater supplies and must be expanded beyond the mineral rights boundaries. As discussed on pages 15-19 of Appendix M, numerous holes must be drilled and blasted sequentially into a void (the free face) in order to fracture rock and create mining excavations. Any blast damage to surrounding rocks, such as cracks, would be limited to a few feet surrounding the excavation. Therefore, blasting cannot "damage the aquifer" or cause draining of surface water and groundwater.

In regard to the hydrogeology model and area of potential impact to domestic water wells, the commenter is referred to Chapter 4.8, Appendices K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 710-5

The commenter questions why solar energy was not proposed to mitigate energy consumption of the project. The commenter also states that a project alternative that utilizes solar should be included in the DEIR. Regarding a solar energy system, while solar panels are not currently proposed as part of the project, the roof space of the project buildings may be available in the future for installation of solar panels to reduce the project's reliance on the energy grid. However, any such solar power generation would be small in comparison to the requirements of the project. Notably, the GHG emissions presented in the DEIR are conservative, since California regulations will reduce GHG emissions overtime. For instance, Senate Bill 100 requires that zero carbon

energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis. (DEIR, Appx. E.1.)

Response to Comment Ind 710-6

The commenter states that the cleanup of the Centennial Industrial Site should be included in the DEIR. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA and Response to Comment Grp 21-122.

Response to Comment Ind 710-7

The commenter asks how the level in the pond will be regulated to prevent emergency overflow into South Fork Wolf Creek and what happens if the water treatment plant shuts down for any length of time, and whether the pond would overflow and flow into South Fork Wolf Creek under this circumstance. The water treatment plant is designed for a maximum treatment rate of 2,500 gallons per minute and all equipment would be in place to increase treatment to this capacity at any time it was necessary. (DEIR, p. 4.8-42.) Pumps in the underground mine pump to the water treatment pond and can be turned on and off as necessary by mine employees. Supervisors on the surface can communicate with underground and surface workers though radio communications to provide necessary instructions. The water treatment pond provides water storage capacity so that the mine pumping and water treatment are not required to be identical but would average the same rates over a day or several days. As discussed in Section 4.5 of Appendix K.2, at the maximum mine dewatering rate of 2,500 gpm, the pond has the capacity to hold the volume of water that would be dewatered during two days of pumping. At the maintenance dewatering rate of 850 gpm, the pond has the capacity to hold the volume of water that would be pumped over more than six days. (DEIR, p. 4.8-74.) This capacity allows time for any necessary maintenance or repairs to the water treatment plant without curtailment of underground dewatering. As discussed in Section 5.4 of Appendix K.4, the removal of sludge from the water treatment pond can be achieved with slurry pumps. Therefore, the periodic removal of settled solids would not require the curtailment of mine dewatering. In addition, the underground mine has a substantial capacity if it were ever necessary to curtail water pumping for an extended period of time. An estimate of the volume of existing mine workings is provided in Section 3.3.3.2 of Appendix K.2, with the lower levels (2300 – 3280 level) having a volume of 84-acre ft and the entire mine having a total volume of 1,183 acre-ft. At an average inflow rate of 850 gpm (3.75-acre ft per day) it would take approximately 22 days for the lower levels of the mine to flood and approximately 314 days for the entre mine to flood. The site drainage plan for the Brunswick site routes the majority of precipitation run-off from the site to the storm water detention basin, not the water treatment pond, as shown in Drawing H-4 of Appendix K.5. Section 4.5 of Appendix K.2 discusses the 6.4-acre catchment area where precipitation would inflow into the water treatment pond and confirms that the designed freeboard volume is more than adequate to retain the runoff from an extreme storm event. As discussed above, the pond would not overflow due to maintenance or precipitation events of at least a 100-year storm. (DEIR, p. 4.8-74.)

The commenter asks what the settling rate is for the water. As discussed above, at the maximum mine dewatering rate of 2,500 gpm, the pond has the capacity to hold the volume of water that would be dewatered during two days of pumping. (DEIR, 4.8-74.) At the maintenance dewatering rate of 850 gpm, the pond has the capacity to hold the volume of water that would be pumped over more than six days. (*Ibid.*) The water treatment plant also incorporates media filtration. As stated on page 5-3 of Appendix K.4, during initial NBS shaft dewatering, the total suspended solids (TSS) in the underground water are expected to be low, and data presented by EMKO from

their sampling events shows suspended solids below laboratory detection limits (<5 mg/L) in the water currently flooding the shaft (EMKO 2020, Table 3-6). During active mining, the amount of TSS in the water is expected to increase and will be heavily influenced by the effectiveness of the underground settling sumps. Assuming that water discharged from the mine has suspended solids of 100 mg/L, which are subsequently reduced by settlement in the pond to the 20 mg/L treatment goal (EMKO 2020 Table 4-10), and an average flow rate of 850 gallons per minute, the mine would produce approximately 37 tons per year of silt-born sludge. The requirements of treated water discharge include requirements for total suspended solids and ensure that total suspended solids of water released to South Fork Wolf Creek meets water quality goals. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

The commenter asks how quickly the water will be treated and released. Appendix K.4 of the DEIR describes the design and operation of the water treatment system. The treatment plant would be sized to treat the maximum pumping rate from the mine of 2500 gpm (3,600,000 gallons per day). The initial dewatering of the mine requires the pumping of the water volume currently in the flooded mine as well as groundwater inflow into the mine. If this maximum pumping rate is not achieved during initial dewatering due to operational concerns, the duration of time to complete initial dewatering would be extended. The pumping rates during initial dewatering would be determined by company management and supervisors in accordance with relevant permit requirements and operational concerns. The discharge from the mine into South Fork Wolf Creek will be governed by the Central Valley Regional Water Quality Control Board, who will have enforcement authority over discharges from the mine. Please see Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 32 - Temperature of Mine Water Discharge.

The commenter asks if the water treatment plant will be staffed by a licensed water treatment plant operator 24/7. The water treatment plant is not a public water system or potable water treatment facility and therefore does not require licenced operators. However, water treatment plant operators will be trained to operate the water treatment plant and the plant will be staffed 24 hours per day, 7 days per week. Numerous trades people such as electricians and millwrights are available at the site to assist with mechanical repairs and maintenance.

The commenter asks if backwash material would be placed into the same pond. As stated on page 4-2 of Appendix K.4, a mechanical solids separation process, such as centrifugation, or belt or drum filters, will be installed onshore in order to segregate the solids from the pyrolusite media backwash stream that will be returned to the clay-lined pond. In this manner, the pond will remain unaffected by the solids generated by backwash events.

Response to Comment Ind 710-8

The commenter states that DEIR is inconsistent with regard to the volume of water to be pumped from the mine. The commenter states this information is necessary during a drought. Flow quantities in the DEIR are rounded and 2,500 gallons per minute is equivalent to 5.57 cubic feet per second, which is rounded to 5.6 cubic feet per second. (DEIR, p. 4.8-54.) The commenter is referred to Master Response 16 - Drought and Climate Change.

Response to Comment Ind 710-9

The commenter states that more precise and consistent references to flow rates are needed in the DEIR. Water flows are estimates and the level of precision requested by the commenter is not required for the analysis of the DEIR. Please see Response to Comment Ind 710-8.

Response to Comment Ind 710-10

The commenter states that the DEIR must discuss discharges to South Fork Wolf Creek during abnormal rain events. The DEIR discusses treated water discharge into South Fork Wolf Creek during normal and abnormal precipitation events. As stated on page 4.8-70 of the DEIR, at the Brunswick Industrial Site, a detention basin would be constructed at the downstream toe of the engineered fill placement slopes, above South Fork Wolf Creek (see Figure 4.8-15). The detention basin for the Brunswick Industrial Site is sized to detain storm flows to compensate for the quantity of treated mine water discharged to South Fork Wolf Creek, in addition to compensating for increased runoff from potential future industrial development of the site. Peak storm flows at both the Centennial and Brunswick Industrial Sites would be reduced to levels less than existing conditions peak storm flows due to the detention basins that would be constructed below the engineered fill areas.

Response to Comment Ind 710-11

The commenter states that the DEIR is lacking a discussion of beneficial uses of treated water from the mine. As stated on page 2 of Appendix N, the mine water flow would have a positive effect on water supply. NID could adjust its flows upstream to use the extra water available downstream if it desired to. The commenter suggests that the water could be re-introduced back into the ground. Some water may recharge into the ground as its flows in South Fork Wolf Creek and then Wolf Creek. However, the recharge of most or all of the mine water discharge back into the low permeability fractured rock would be difficult if not impossible and require many injection wells throughout the mine area and the associated infrastructure such as wells and pipelines. The benefit of such an endeavour is not apparent and is not required for the project to reduce significant impacts to a less than significant level.

Response to Comment Ind 710-12

The commenter states that the DEIR must include discussion of a possible underground river to avoid the impacts that occurred at the Siskon Mine. No “underground rivers” are present in the mine area and proposed mining is in rock unlike the San Juan Ridge mine, which was a near surface underground gravel mining operation. The commenter is referred to Chapter 4.8, Appendices K.2 and K.3 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 710-13

The commenter requests that the determination of less than cumulative considerable for Impact 4.2-6 is further analyzed given the poor air quality of the region. The commenter is referred to Master Response 18 - Air Quality Thresholds, and Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 710-14

Compliance of the project with Energy Action Plan strategies has been analyzed in Table 4.3-22 in the DEIR and was determined to be consistent with the EAP. The commenter is also referred to Master Response 25 - Nevada County Energy Action Plan. Regarding a solar energy system, while solar panels are not currently proposed as part of the project, the roof space of the project buildings may be available in the future for installation of solar panels to reduce the project’s reliance on the energy grid. However, any such solar power generation would be small in comparison to the requirements of the project. Notably, the GHG emissions presented in the DEIR are conservative, since California regulations will reduce GHG emissions overtime. For instance, Senate Bill 100 requires that zero carbon energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of

electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis. Please also see Response to Comment Agcy 8-17.

Response to Comment Ind 710-15

The commenter objects to the findings of 4.7-5 and 4.8-6 in the DEIR but provides no specific reason or evidence for this objection. The comment noted.

Response to Comment Ind 710-16

Please see Master Response 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criteria Pollutant Thresholds During Operations.

Response to Comment Ind 710-17

The commenter concludes that the DEIR is generally inadequate. The comment is noted for the decisionmakers.

Individual Letter 711

From: Sara Brownw
To: Idaho MMEIR
Subject: Idaho-Maryland Mine Project
Date: Monday, February 7, 2022 7:31:29 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr Kelley,

Ind 711-1 I am very worried about the effects of the mine on the stability of the lands through and under which the project will encompass. I can clearly visualize worrisome disruptions in underground water resources affecting property owners, watersheds, and ecosystems that are dependent on what is established now. I don't think it's wise to wreak havoc on our community for the financial gain of a mega corporation. We are just recovering from the environmental tragedy of the gold mining era, and now having to learn to cope with the threat of wildfire: why would we choose to add to the stressors of this community?

Please consider the effects of such an industrial project on the environment and its inhabitants: plants and animals, humans included.

Thank you,

Sara Cooper Brownwood

INDIVIDUAL LETTER 711: SARA BROWNWOOD

Response to Comment Ind 711-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. For concerns related to underground water resources and ecosystems, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, Master Response 32 – Temperature of Mine Water Discharge, Master Response 35 – Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek.

Individual Letter 712

RISE GRASS VALLEY
Rise Grass Valley
PO Box 271
Grass Valley CA 95945

P-4 P33 104**********ECRWSH**C002
Sarah Miller Lazard
10331 Banner Lava Cap Rd
Nevada City, CA 95959-3323

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BOARD OF SUPERVISORS

THE IDAHO-MARYLAND MINE: A PROUD HISTORY

The Idaho-Maryland Mine was one of the most productive and best-known gold mines in the United States, producing approximately 2.4 million ounces between 1866 and 1955. The mine closed in 1956 as the fixed price of gold at $35 per oz made the mining of American gold unprofitable.

Rise Grass Valley will reinitiate mining and will do so with a focus on green-friendly practices and minimizing the impacts to neighbors. The project will use modern, clean, state-of-the-art mining equipment and proven techniques to produce "green gold." The result is a project that has no significant impacts to water, air quality, and the natural environment or from noise or vibrations during operations.

When in full operation, Rise Grass Valley's Idaho-Maryland Mine project will create hundreds of good-paying jobs and realize broad economic benefits for Nevada County.

Ind 712-1

Please fill out and send back to us your support for the Idaho-Maryland Mine

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) NO I BELIEVE THIS
Address ZIP
Phone MINE SHOULD BE STOPPED
Email Address
I AM A HOME OWNER. BUILDING OWNER, BUSINESS OWNER

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit RiseGrassValley.com/contact and sign up.

INDIVIDUAL LETTER 712: SARAH LAZARD

Response to Comment Ind 712-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 713

From: Sarah Bliss <sarahblisss@gmail.com>
Sent: Monday, April 4, 2022 4:34 PM
To: Idaho MMEIR
Subject: Stop the Idaho Maryland Mine

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To Whom It May Concern:

Ind 713-1 I am writing to share that I strongly oppose Rise Gold's unnecessary reopening of the Idaho Maryland Mine. I moved from the Bay Area in 2020 and now live near downtown Grass Valley. One of the things I love most about living in Grass Valley is how peaceful and clean it is.

Ind 713-2 When I imagine our beautiful little town being taken over by the mine, it breaks my heart. This mine would operate 24/7 for up to eighty years and has the potential to bring so much pollution, toxicity, and sickness to our community. The constant dust, carbon emissions from mine owned trucks, and inevitable toxic spills will literally make our residents ill. Nevada County already has a high rate of deaths due to chronic lung disease and having the mine here would only make it worse.

Ind 713-3 Our power grid is already so strained and the Idaho Maryland mine would call for massive amounts of energy usage. Why should we prioritize corporate greed over our own citizens? I know my ability to work from home has been impacted several times by loss of power. Knowing that the mine would be taking more energy from our grid for profit is upsetting to say the least.

Ind 713-4 The CEO of Rise Gold has been proven to have a negative track record in Canada, where tribal waters were polluted and left for someone else to clean up. Why would we give such an irresponsibly run company a chance to cause harm to our beloved community?

Finally, we all know water is a scarce and precious resource. Rise Gold would be pumping out millions of gallons per day for decades. Our local flora and fauna (not to mention private residents with wells) deserve more reverence and respect.

Ind 713-5 I am strongly opposed to the Idaho Maryland Mine and know that allowing Rise Gold to have a place in our town would be a grave mistake. Please don't allow harm to come to our community in this way. Thank you for your time and consideration.

Best,
Sarah Snyder & Family

INDIVIDUAL LETTER 713: SARAH SNYDER

Response to Comment Ind 713-1
The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Response to Comment Ind 713-2
The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. For concerns related to dust and airborne chemicals, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; for concerns related to exhaust, please see the health risk assessment (DEIR Appendix E.1), the results of which are incorporated into Chapter 4.3; and for concerns related to spills, please see Chapter 4.7, Hazards and Hazardous Materials.

Response to Comment Ind 713-3
The comment does not address the adequacy of the DEIR. Please refer to Chapter 4.11, Public Services and Utilities, for additional information regarding the project's impact on electricity supplies. As discussed on page 4.11-34 of the DEIR, the electrical grid system in the project area is well developed. A commercial sawmill that previously operated on the Brunswick Industrial Site was serviced by a dedicated 12kV PG&E power line. A high voltage power line also runs through the property west of the Brunswick shaft. Electricity for the project would be supplied by the existing 12kV PG&E line along Brunswick Road. The BRUNSWICK 1102 Circuit (Circuit), which would serve the project, has a rating of 13.26 MW. The project's total connected load is estimated at approximately 10 MW, with a net load of approximately 6 MW. As of the year 2021, the Circuit operates at 5.15 MW, or approximately 39 percent of the Circuit's maximum capacity. Based on PG&E's usage projections, the Circuit load is anticipated to drop to approximately 4.74 MW by the year 2025. Considering the project would generate an electric load of approximately 6 MW, and the Circuit currently provides 5.15 MW, the Circuit capacity would increase to 11.15 MW following implementation of the project. The increase in wattage associated with implementation of the project would remain within the Circuit's capacity of 13.26 MW and, thus, the Circuit would have available load capacity to accommodate the project

Response to Comment Ind 713-4
Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 713-5
For concerns related to groundwater use and effects on local flora and fauna, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 33 – Groundwater Dependent Vegetation. The commenter's concerns and opposition to the proposed project are noted for the record and have been forwarded to the decisionmakers for their consideration.

Individual Letter 714

From: Sasha Soukup <astralweekend.shop@gmail.com>
Sent: Monday, April 4, 2022 9:59 AM
To: Idaho MMEIR
Subject: Comments re: DEIR on proposed mine

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Hi there!

Ind 714-1 I am a 16 year Grass Valley resident, business owner, local musician, and social media activist, and I am writing regarding the DEIR on the proposed Idaho-Maryland Mine.

I live two miles from the mine site (at Brunswick) and I am extremely concerned in particular about the heightened noise levels, the change of traffic volume, and the long term air quality impact that could result from the mine operations. I don't believe that the DEIR adequately addresses these issue- for example, it cites that the noise resulting from the mine is in the "acceptable" decibel level, when in fact the decibels cited as acceptable are several times the level of a garbage truck collecting trash. This is absolutely not acceptable, and I question how this threshold was established.

I also question the plan to measure air quality in the region of the mine- the DEIR doesn't seem to include the totality of air pollutants from mine operations. As someone with asthma who already struggles during fire season with the poor air quality in Nevada County, I want to know that any new industrial activity that contributes particulate matter and exhaust to the air is being measured accurately and thoroughly.

Ind 714-2 These are just a few of the areas in the DEIR that seem inaccurate and incomplete to me, and I urge you to demand a new DEIR that is done correctly.

Thanks for your time,

Sasha Soukup

--
Shop: www.AstralWeekend.com
Cel: 925-518-0315

1

INDIVIDUAL LETTER 714: SASHA SOUKUP

Response to Comment Ind 714-1

Air pollution is addressed in Chapter 4.3 of the DEIR, and Noise is addressed in Chapter 4.10. Based on the project-specific noise analysis, which was independently reviewed by the County's third-party noise consultant, none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Regarding changes in traffic volumes, please refer to Chapter 4.12, Transportation.

Response to Comment Ind 714-2

The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the DEIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HRA presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR. Several commenters identified not being able to see the risk of the HRA visually. Isopleth figures were developed in response to these comments, which show where the project's emissions would travel. Please see Dudek Memo – Isopleths attached to the Final EIR as Appendix K.

The commenter otherwise suggests that the DEIR contains inaccuracies and is incomplete but provides no specific examples. Thus, a specific response is not possible.

Individual Letter 715

From: Patty Marsters
To: Idaho MMEIR
Subject: IdahoMarylandMine DEIR
Date: Monday, February 21, 2022 8:33:17 PM

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To: Matt Kelley, Sr. Planner

Nevada County Planning Dept.

950 Maidu Ave. Suite 170

Nevada City, CA 95959-7902

Ind 715-1 As a member of the Ironhorse Townhome Association, we agree with the Board of Directors' opposition to the proposed IMM project and the impacts identified in their response to the DEIR.

Ind 715-2 In California, water is so scarce. There can be no justification for risking the supply or quality of well and groundwater. Increasing the consumption of NID water to replace lost or tainted well water is not a mitigation of Impact 4.8-2, it is a negative impact in itself.

Ind 715-3 According to the DEIR Executive Summary, the "No Project/No Build" alternative is environmentally superior.

Ind 715-4 RISE suggests they're doing the community a favor in the short term by creating jobs and in the long run by preparing more land for industry. But does the EIR fully investigate the socio-economic impacts (Policy 17.10)? This isn't the first time a town or county has been tempted to try to raise revenue by adding jobs and businesses. Before allowing IMM to proceed, consider the lesson learned throughout the rest of the state that adding more jobs results in higher prices and more competition for housing (i.e. less available housing).

The IMM project is not a good use of our environmental or social and physical resources.

Sincerely,
Scot and Patty Marsters
136 Ironhorse Place
Grass Valley, CA

INDIVIDUAL LETTER 715: SCOT AND PATTY MARTSERS

Response to Comment Ind 715-1
The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Response to Comment Ind 715-2
Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 715-3
The commenter does not address the adequacy of the DEIR, but rather restates its finding that the No Project (No Build) Alternative would be the environmentally superior alternative.

Response to Comment Ind 715-4
The comment pertains to economic and social issues - please see Master Responses 1 and 2.

Individual Letter 716

From: JS Peterson <peterson.js@gmail.com>
Sent: Wednesday, March 23, 2022 6:42 PM
To: Idaho MMEIR
Subject: Idaho Maryland Mine proposal

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Ind 716-1

I am totally opposed to opening up the mine which my father worked at in the 1950s.

There EIR is totally biased and corrupt. Why the County is relying on the developer for information is totally corrupt. They are only giving you info that benefits their cause.

We don't want pollution!

This penny stock foreign corporation is just out to scam folks for profit.

Their motto is screw Nevada County and run back to Canada with the profits.

Turn down the Rise scam.

Scott Peterson
95945

INDIVIDUAL LETTER 716: SCOTT PETERSON

Response to Comment Ind 716-1

The commenter suggests that the DEIR is biased but does not provide any evidence to support this spurious claim. The CEQA Guidelines allow a Project Applicant to prepare a DEIR as long as the lead agency, in this case Nevada County, independently reviews the DEIR. (14 CCR 10584(d)(3); (e).) Not only did the County independently peer review the information provided by the applicant, but the County hired Raney Planning and Management to prepare the DEIR. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 717

From: Sean Johnson <seanspuppet@gmail.com>
Sent: Sunday, April 3, 2022 8:04 PM
To: Idaho MMEIR; DEIRcomments@cea-nc.org
Subject: No Mine

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Dear Board of Supervisors,

My name is Sean Johnson, I'm a of Grass Valley and I'm writing to express my opposition to the reopening of the Idaho Maryland Mine.

Ind 717-1 I've reviewed the Draft Environmental Impact Report and I feel it is woefully inadequate. I have three main issues that I'd like you to address. First, the Canadian company attempting to reopen the mine has boasted that the mine will bring 600 jobs to the area. The DEIR states that the mine will have no impact on traffic, I'd like to know exactly how you can add this many jobs to the region and have no impact on traffic. Second, as a resident that relies on well water, I feel the

Ind 717-2 DEIR doesn't fully address how the mine will not have a negative impact on local wells or local water quality. Please let me know how draining the water from the mine and dumping water into local streams and rivers won't have a negative impact on wells and our local environment. Finally, as someone that moved to this area to enjoy the peace and quiet I'm concerned about noise pollution. The DEIR doesn't fully explain how five years of construction and a fully operational mine will have no impact on noise pollution. Please provide more details on how mine construction

Ind 717-3 and operation won't have an impact on noise in the area.

I look forward to receiving your response.

Sincerely,
Sean Johnson

INDIVIDUAL LETTER 717: SEAN JOHNSON

Response to Comment Ind 717-1

Traffic is evaluated in Chapter 4.12, Transportation, of the DEIR. As noted therein, the DEIR does not claim that the proposed project would have no impact on traffic; rather, impacts to certain intersections were concluded to be significant. Nevada County, as the lead agency, will consider such impacts when determining whether to approve the project.

Response to Comment Ind 717-2

Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 717-3

Noise is addressed in Chapter 4.10. The DEIR does not claim that 5 years of construction will have no noise impacts. Rather, the DEIR finds that construction noise from installation of the potable water pipeline along East Bennett Road would have a temporary significant and unavoidable noise impact to nearby residents, even after implementation of mitigation.

Based on the project-specific noise analysis, which was independently reviewed by the County's third-party noise consultant, none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Individual Letter 718

From: Shannon Ross <shannon.ross22@gmail.com>
Sent: Monday, April 4, 2022 9:29 AM
To: Idaho MMEIR; deircomments@cea-nc.org
Subject: Draft EIR - Inadequate

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Attention Nevada County Supervisors & Planning Commission:

Ind 718-1 The Draft EIR is completely inadequate. Having been a court reporter for 35 years and listening to many hearings on environmental issues, it is from my experience that the only this this Draft EIR will lead to is a lawsuit against the county.

Ind 718-2 First off, the process did not include discussions or information from local tribes. It is beyond belief that the leaders of this county would tear down this town with contaminated air, destroy wildlife corridors and habitat, and basically turn a wonderful tourist destination into a town that has the look and feel of a burned out old Appalachian mining town.

Ind 718-3 This is not 1920. As a community we all have worked to create a beautiful historical town where people love to live and enjoy the outdoors.

Ind 718-4 The Draft EIR does not devote enough thought or research into Air Quality and what 24-hour Noise will do to our health. It does not consider native people. You have to pretend global climate change is NOT A THING to understand how they put the studies together.

Ind 718-5 It is not possible that a snake will change it's stripes, and to allow a foreign company to come into the beautiful foothills of California with this crappy Draft EIR and believe that they will be good for their word is the most insane thing this county can do. You will destroy our homes and our city.

Ind 718-6 The Draft EIR does not address water adequately. To say that only 30 wells will be affected, is ludicrous. You don't have to be a scientist to understand this is just false.

Ind 718-7 There are so many flaws in the Draft EIR, you must do a new one that takes into account: the health of the citizens of this county, the water, the air, and native peoples and lots more science on the destruction of our wild birds and animals that will all be destroyed if you allow this mining company in here to do some ancient form of gold mining and take us back to the 1850s.

1

You people disgust me that you would ruin our town like this.

Thank you for your time,

Shannon M. Ross
Certified Shorthand Reporter, No. 8916
530-570-9573
shannon.ross22@gmail.com

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INDIVIDUAL LETTER 718: SHANNON ROSS

Response to Comment Ind 7

The commenter states that the DEIR is complete inadequate but provides no evidence to support this spurious claim. Please see Master Response 1. See the below responses to more specific comments.

Response to Comment Ind 718-2

Please see Chapter 4.5, Cultural and Tribal Cultural Resources, and, specifically, the following excerpt from page 4.5-21 of the DEIR:

> […] InContext contacted the NAHC on September 10, 2019 to request a search of the Sacred Lands File for tribal cultural resources within or near the project area. The results of the Sacred Lands File search were negative, which indicates that known cultural resources do not exist on the project site.[2] In addition, InContext contacted each of the following Native American tribes with the potential to have knowledge of cultural resources in the project area:
>
> - Colfax-Todds Valley Consolidated Tribe;
> - Tsi Akim Maidu;
> - United Auburn Indian Community of the Auburn Rancheria (UAIC); and
> - Nevada City Rancheria Nisenan Tribe.
>
> In an effort to gather data regarding cultural resources of importance to these entities that could be affected by the project, the above parties were contacted via regular mail, email, and telephone between September 16, 2019 and December 16, 2020. Reponses were not received from any of the above tribes.
>
> On November 25, 2019, Nevada County sent project notification letters with offers to consult pursuant to AB 52 to the Tsi Akim Maidu Tribal Council, Shingle Springs Band of Miwok Indians, Nevada City Rancheria Nisenan Tribe, and UAIC. The Tsi Akim Maidu Tribal Council, Shingle Springs Band of Miwok Indians, and Nevada City Rancheria Nisenan Tribe did not respond within the 30-day consultation period. The UAIC responded on December 18, 2019, and requested consultation and copies of the Cultural Impact Report, technical reports, requests for and results of records searches, and Geographic Information System (GIS) Shapefiles. The County provided such information. In addition, the UAIC noted that they are not aware of any Native American archaeological sites in or near the project site.

As presented above, consistent with CEQA Guidelines and Assembly Bill 52, as part of the DEIR process, local tribes were notified and invited to consult on the proposed project, and such information was presented in the DEIR.

Response to Comment Ind 718-3

For the commenter's general air pollution concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. Regarding impacts to wildlife corridors and habitat, Impact 4.4-4 included in Chapter 4.4, Biological Resources, of the DEIR assessed whether the

[2] InContext. *Historic Properties Inventory and Finding of Effect for the Idaho-Maryland Mine Project, Nevada County, California*. December 2020.

proposed project would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Known migratory deer ranges outlined in the Nevada County General Plan were reviewed as part of the DEIR for deer migration corridors, critical range, and critical fawning areas. According to the Migratory Deer Ranges Nevada County General Plan map, the Centennial Industrial Site and Brunswick Area are located in an area of potential Deer Winter Range. However, field surveys conducted for the proposed project did not record any observations of deer. In addition, the DEIR noted that the Centennial Industrial Site and Brunswick Area do not contain any known major deer migration corridors, known deer holding areas, nor critical deer fawning areas. Based on the analysis included in the DEIR, the proposed project was determined to have a less-than-significant impact related to interfering substantially with the movement of any wildlife.

Please refer to Chapter 4.4, Biological Resources, for general concerns related to habitat impacts.

Response to Comment Ind 718-4

The commenter states that the DEIR does not devote enough thought or research into air quality, but provides no evidence or examples to support this assertion. Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, provides a very detailed analysis of the proposed project's potential air quality impacts. Chapter 4.3 is supported by the technical air quality analysis included as Appendix E.1 to the DEIR. Appendix E.1 also includes the results of a detailed health risk assessment performed in accordance with State guidance. Please see also Master Responses 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criteria Pollutant Thresholds During Operations.

For the concern related to 24-hour noise operations, please see Response to Comment Grp 21-130.

Global climate change is addressed in detail in Chapter 4.3 of the DEIR. Please also see Master Response 27 – Greenhouse Gas Thresholds and Master Response 28 – Greenhouse Gas Credits.

Response to Comment Ind 718-5

Please see Master Response 1 and Master Response 3.

Response to Comment Ind 718-6

Please see Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 718-7

Please see the above responses to comments.

Individual Letter 719

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

March 27, 2022

TO:
Matt Kelley - Senior Planner / Project Manager
AND:
Nevada County Planning Commission
RE:
No Mine in Nevada County
Draft Environmental Impact

I vehemently OPPOSE the reopening of the Idaho-Maryland Mine! I moved to Nevada County in 2001 from Sacramento. We wanted a life living in the trees and a like-minded group of people to embrace the small town, healthy, happy, simpler lifestyle of Grass Valley and Nevada City!

Ind 719-1 The mine and reopening it cannot possibly serve our people of this county. It only serves the money hungry, out of country Rise Mine investors who want to take the gold and run leaving us to deal with all the toxic waste - AIR POLUTION, ENERGY USAGE, CLIMATE CHANGE, DRAINS OUR WATER and PUTS GROUND WATER AT RISKS - TRAFFIC, DUMPING MINE WASTE and NOISE.

(over)

Please
please
please

NO
IDAHO
MARYLAND
MINE

Thank you!

SHAR MCLEOD
12430 SQUIRREL CREEK ROAD
GRASS VALLEY, CA
95945

INDIVIDUAL LETTER 719: SHAR MCLEOD

Response to Comment Ind 719-1

The commenter's opposition to the proposed project is noted for the record and has been forwarded to the decisionmakers for their consideration.

Regarding quality of life concerns, which are outside the scope of CEQA, please see Master Response 1. Regarding the generally noted air quality concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; regarding energy usage, please see Chapter 4.3; regarding climate change, please see Chapter 4.3 and Master Response 16 – Drought and Climate Change; regarding groundwater concerns, please Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells; regarding dumping mine waste, please see Master Response 8 – Mine Waste Characterization; and regarding noise, please see Chapter 4.10, Noise and Vibration.

Individual Letter 720

From: sharondelgado@earth-justice.org
To: bdofsupervisors
Subject: DEIR comments on Mine
Date: Thursday, March 24, 2022 3:00:05 AM
Attachments: Sharon"s DEIR statement march 2022.docx

Dist 1

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Attached please see the comments on the DEIR for the Idaho-Maryland Mine.

Thank you.

Sincerely,

Sharon Delgado

March 24, 2022
The Reverend Sharon Delgado
11328 Red Dog Road
Nevada City, CA 95959

Dear Nevada County Supervisors:

As we residents of Nevada County experience climate change for ourselves and struggle to adapt to extreme drought, heat waves, water shortages, periodic power outages and threat of forest fires, we also must contend with Rise Gold's attempts to persuade the public and local officials that reopening the Idaho-Maryland Mine would do us good. Yet regardless of its flawed and deceptive public outreach and its completely inadequate DEIR, the mine would negatively affect the community in many ways, including in our ability to adapt to and mitigate the impacts of climate change.

Ind 720-1

In June, our region got a taste of a record-shattering heat wave that farther north led to many deaths. We are in a historic "severe to exceptional drought," resulting in depleted reservoirs and mandatory water restrictions. Fire insurance rates are skyrocketing and policies are being canceled as fire season extends to almost year-round and as wildfires become ever more ferocious, burning more acres. Even as we pack our go-bags and create fire safe spaces around our homes, we know that catastrophic forest fires could come at any time.

Reopening the mine would only make these climate-related impacts worse.

Nevada County has had the foresight to respond proactively by adopting the Nevada County Energy Action Plan, which was developed by the Sierra Business Council with support from PG&E in collaboration with Nevada County and community members. The energy use of the mine would eliminate and more than cancel out gains attained through the Nevada County Energy Action Plan.

The plan, based on scientific climate forecasts in the context of our region, states: "From record temperatures to proliferating wildfires and changing precipitation patterns, climate change poses an immediate and escalating threat to the region's environment, economic strength and public health."

Ind 720-2

The plan is intended to "guide local government decisions that will help achieve greater efficiency, reduce costs and demonstrate the county's commitment to energy independence and community resilience," and to "inspire residents, businesses and other public agencies in Nevada County to participate in community efforts and maximize energy efficiency, renewable energy, and water efficiency."

This plan should guide analysis and decision-making about the mine as it relates to climate. It points to goals, strategies and ways to implement policies that will enable us as a community to adapt to projected climatic changes and mitigate harm by lowering greenhouse gas emissions. But reopening the mine would take us in the opposite direction.

Adapting to climate change means developing resiliency so that we human beings, our fellow creatures and coming generations can survive and thrive as much as possible.

This means carefully preserving our region's air, land, and water. The mine would further pollute our air, replace life-sustaining ecosystems with mine waste, and perhaps deplete our precious groundwater, putting wells at risk and sending millions of gallons of treated wastewater daily down Wolf Creek.

Ind 720-3

Adaptation means generating sustainable forms of livelihood, housing, education, business, agriculture, and more — locally-based as much as possible — and moving away from fossil fuels to justly sourced renewable power. Many community members, local businesses and local nonprofits are working to attain just such a vision. Rise Gold's project as described in the DEIR does not align with these goals.

Ind 720-4

Because it is a global problem, we must also do our part to mitigate the harm of climate change by reducing our regional carbon footprint. The Nevada County Energy Action Plan calls for gradually reducing annual residential electric use by 12 percent. Rise Gold's projected electrical use would cancel out this goal by annually using electricity equivalent to 5,000 new homes and could strain our already overburdened power grid.

Ind 720-5

Even more significant would be the massive carbon emissions caused by diesel-powered heavy equipment used for: constant construction during the first year and half; ongoing continuous excavating, underground blasting, drilling, rock crushing, loading, hauling, unloading, spreading, and compacting to create engineered fill up to seven stories tall; continuous mine dewatering by pumping, treating and sending millions of gallons of wastewater down Wolf Creek; increased new diesel truck traffic (up to 100 round trips a day, seven days a week, 16 hours a day). This would result in significant increases of greenhouse emissions rather than decreases as outlined in the county's Energy Action Plan.

Ind 720-6

What makes sense for Nevada County in light of these impacts on the climate system? In the words of the California Air Resources Board 2017 Climate Change Scoping Plan: "Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development." Given this goal and the tremendous impact on local emissions, the EIR must establish a net zero threshold for new GHG emissions from the project and declare that it has significant and unavoidable impacts.

The county has taken a proactive approach with its plan to foster resiliency and mitigate the harmful effects of climate change. Let's not turn back now.

Sharon Delgado

INDIVIDUAL LETTER 720: SHARON DELGADO

Response to Comment Ind 720-1

The commenter states the DEIR is inadequate. Responses to specific comments are provided below. The commenter states that approval of the project would exacerbate climate change. As stated on page 4.3-92 of the DEIR, with implementation of mitigation, the project's incremental contribution to global GHG emissions and climate change is less than cumulatively considerable. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 720-2

The commenter states that the project's energy usage would interfere with the County's Energy Action Plan. The commenter also states that the project would exacerbate climate change. Although the County's Energy Action Plan is not a Qualified GHG Emissions Reduction Plan under CEQA, the DEIR nevertheless states that the project is consistent with the Energy Action Plan. (DEIR, p. 4.3-88.) The commenter is also referred to Master Response 25 - Nevada County Energy Action Plan. Regarding climate change, with the implementation of mitigation, the project's incremental contribution to global GHG emissions and climate change is less than cumulatively considerable. (DEIR, p. 4.3-92.) The commenter is also referred to Master Response 27 - Greenhouse Gas Thresholds and Master Response 25 - Nevada County Energy Action Plan. The commenter also states that the project would pollute our "air, land, and water" but provides no additional detail. Air emissions from the project are analyzed in Chapter 4.3 of the DEIR, biological impacts are analyzed in Chapter 4.4 of the DEIR, and groundwater impacts are analyzed in Chapter 4.8 of the DEIR.

Response to Comment Ind 720-3

The commenter states that many in the community are focused on moving towards energy produced by renewable sources and questions why solar energy was not proposed to mitigate energy consumption of the project, pointing to the Nevada County Energy Action Plan reduction goals. Compliance of the project with Energy Action Plan strategies has been analyzed in Table 4.3-22 in the DEIR and was determined to be consistent with the Energy Action Plan. The commenter is also referred to Master Response 25 - Nevada County Energy Action Plan. Regarding a solar energy system, while solar panels are not currently proposed as part of the project, the roof space of the project buildings may be available in the future for installation of solar panels to reduce the project's reliance on the energy grid. However, any such solar power generation would be small in comparison to the requirements of the project. Notably, the GHG emissions presented in the DEIR are conservative, since California regulations will reduce GHG emissions over time. For instance, Senate Bill 100 requires that zero carbon energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis.

Response to Comment Ind 720-4

The commenter references the Energy Action Plan and states that the County should strive to reduce electric use and the project would eliminate progress towards that goal. The commenter is referred to Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Ind 720-5

The commenter states that a number of the project's components would increase GHG emissions and contribute to climate change. As stated on page 4.3-92 of the DEIR, with implementation of mitigation, the project's incremental contribution to global GHG emissions and climate change is

less than cumulatively considerable. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds and Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Ind 720-6

The commenter states that a goal of any new development or project is to result in no net additional increase in GHG emissions. A net zero threshold is not required for the project. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

Individual Letter 721

From: Thomas Seck
To: BOS Public Comment
Subject: Using history and common sense
Date: Wednesday, February 2, 2022 1:45:57 PM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 721-1

February 2, 2022

To our Board of Supervisors, I hope you all read our wonderful local newspaper The Union. The letter written in todays " other voices" section hit the nail right on the head. Mr. Tony Lauria stated the facts that all of us who lived here then and now remember about the not so glorious days when the mines were close to shutting down. I was 10 years old and walking to school at Hennessey and had to cross Wolfe creek where it flowed gray and scary. I felt if I ever fell in it would dissolve me. Please read Mr. Lauria's article and use your common sense.

Sharon Lynch Seck, R.N. (retired(

INDIVIDUAL LETTER 721: SHARON SECK

Response to Comment Ind 721-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1.

Individual Letter 722

Sharon C. Wagner
10165 Mills Road
Grass Valley, CA 95945
530-272-1082

RECEIVED
MAR 25 2022
NEVADA COUNTY
PLANNING DEPARTMENT

March 21, 2022

Matt Kelley, Senior Planner
Nevada County Planning Dept.
950 Maidu Ave., Suite 170
Nevada City, CA 95959-7902

Re: Idaho-Maryland Mine Project

Dear Mr. Kelley,

I have lived in Grass Valley since 1973 when I was in my 20s. I moved here from Sacramento to enjoy the beauty of the area and the small town atmosphere. It was peaceful here. A wonderful place to raise children.

Ind 722-1 As I learned more about the history of the area, the realities of the mining industry made a deep impression on me. I could see the destruction wrought by the hydraulic mining that was eventually outlawed. I toured the Empire Mine site and was amazed at the extensive honeycomb of tunnels beneath the ground. I learned that the stamp mills ran day and night to process the ore removed from the mines. I couldn't imagine how anyone could endure that constant noise and pounding. I learned of the contamination of water and earth from heavy metals that were a byproduct of the mines. We are still dealing with cleaning up that contamination.

Ind 722-2 While the new mining project may have differences from past practices, it's still an industrial mining project. Its reality will involve blasting, loading truck after truck with the material being removed from the ground, and transporting that material over our local roads in truck after truck rumbling through our community. The mining company contends that the noise, dust, wear and tear on the roads, and inconvenience to residents won't be that bad. Sounds pretty bad to me.

Ind 722-3 They promise that they won't deplete or contaminate the aquifer that supplies water to people's wells, or that if they do, they'll do something to make up for it. Sounds iffy to me. The amount of water they will be using daily for their project is astounding, especially while we are suffering through historic drought conditions.

Ind 722-4 The picture they paint of how they will mitigate the impact to our community is too rosy for me to believe. The potential loss to the beauty and peace of our community is too great. The proposed benefit seems to be only for the mining company. The number of jobs they propose to create seems like a very small positive measured against a huge negative. The details of this project that I have read about in The Union seem like a nightmare scenario for my beloved Grass Valley.

We are not a mining community anymore. This mining project will not make people want to move to Grass Valley to work, raise a family, retire, or even vacation. It will make them ask how anyone could live in a place like that? And those of us who already live here will suffer the consequences brought on by this project. The mining company may downplay the negative impact, but I'm not buying it.

We are a community of art, theater, music, schools, families, retirees, technology and invention, clean industry, recreation, tourism.

Please don't send us back to the ugliness of our mining history. Let it remain in the past. Please reject this project.

Sincerely,

Sharon C Wagner

Sharon Wagner
10165 Mills Rd
Grass Valley, CA 95945
530-272-1082

INDIVIDUAL LETTER 722: SHARON WAGNER

Response to Comment Ind 722-1

The comment does not address the adequacy of the DEIR, but rather provides information on historical mining in the area and its effects. No response is required.

Response to Comment Ind 722-2

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the Project Driveway and Brunswick Road. (DEIR, p. 4.12-91.)

Pursuant to Mitigation Measure 4.3-2 and the minimum requirements of the Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations, the project must ensure that visible dust does not cross the boundary of the property and that the project is in compliance with the approved Asbestos Dust Mitigation Plan and would be required to take whatever necessary measures to ensure compliance.

Response to Comment Ind 722-3

Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change, as well as the analysis in Chapter 4.8, Hydrology and Water Quality.

Response to Comment Ind 722-4

The comment does not address the adequacy of the DEIR. Social and economic concerns expressed by the commenter are outside the scope of CEQA, but have been noted for the record and forwarded to decision-makers for their consideration. Please see Master Responses 1 and 2.

Individual Letter 723

From: Shayna Christie
To: bdofsupervisors
Subject: Opposition to the Idaho-Maryland mine
Date: Tuesday, February 15, 2022 4:42:30 PM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 723-1

I'm a district 3 resident and I would like to voice my opposition to the reopening of the Idaho-Maryland Mine.

Shayna Christie

INDIVIDUAL LETTER 723: SHAYNA CHRISTIE

Response to Comment Ind 723-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 724

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Sheerlie Rynglev

Address: 14343 Moon Shadow Dr, Nevada City, 95959

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

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

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Like the vast majority of this community, I am vehemently opposed to this project. This community is still dealing with the mining history of these lands. We just tested our well (dug only in 2017) and it has TEN times the federal limit of ARSENIC. I spoke with a water remediation specialist and she said that is actually low for our area. She said she very frequently sees wells testing for THIRTY times the federal limit of arsenic. We are experiencing some of the worst droughts (every year) in history and we cannot risk one of our most precious resources for the continuation of LIFE with this unecessary, non-beneficial and reckless project. As we all know, one of the most important aspects of our local economy is TOURISM. It provides more economic benefit to our economy in a single year than this project could accomplish in its entire duration. And WHY do people flock here to visit from near and far? It's because of the pristine nature, the peace and quiet that is a hallmark of our community. All of that would be destroyed by this project. The pristine nature is ~~also~~ and quality of life is also why people even want to live here, despite wildfire risk. This project would rob of us of the reasons we live here and endure, PLUS would put us at even greater wildfire risk by disturbing the very precarious balance of our ecosystem. WHY are we still talking about this?! We are all against it! Enough.

Ind 724-1
Ind 724-2
Ind 724-3
Ind 724-4

INDIVIDUAL LETTER 724: SHEERLIE RYNGLER

Response to Comment Ind 724-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. Regarding well concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 724-2

Please see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 724-3

Please see Master Responses 1 and 2 regarding quality of life and other social/economic concerns.

Response to Comment Ind 724-4

The comment does not address the adequacy of the DEIR, and has been noted for the record. In addition, please see Master Response 33 – Groundwater Dependent Vegetation.

Individual Letter 725

From: SHEILA LARUE
To: Idaho MMEIR
Subject: Idaho-Maryland Mine Project
Date: Sunday, February 20, 2022 2:49:38 PM

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Ind 725-1

I am asking you to reject this very destructive project. it will severely damage our area, and I do so hope you refuse to allow this extremely damaging project to take place.

Thank you for your consideration,
Sheila J. LaRue, An Alta Sierra resident and voter

INDIVIDUAL LETTER 725: SHEILA LARUE

Response to Comment Ind 725-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 726

From: sheri_trailgearusa.com <sheri@trailgearusa.com>
Sent: Sunday, April 3, 2022 5:16 PM
To: Idaho MMEIR
Cc: Ed Scofield
Subject: I oppose the mine

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Dear Matt,

Ind 726-1 I oppose reopening the Idaho Maryland mine. It will use too much of our precious water resources, will release toxic compound into our water and hurt our property values. There is no benefit for the county.

Regards,

Sheri Fogarty

INDIVIDUAL LETTER 726: SHERI FOGARTY

Response to Comment Ind 726-1

Please see Master Response 2 regarding property values. Water resources and hazardous materials are discussed in chapters 4.7, Hazards and Hazardous Materials, and 4.8, Hydrology and Water Quality, of the DEIR. Please also see Master Response 35 – Discharge to South Fork Wolf Creek.

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers.

Individual Letter 727

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Phone: 530-265-1423
Email: Idaho.MMEIR@nevada.ca.us

February 23, 2022

Dear Nevada County Board of Supervisors:

Ind 727-1 I am OPPOSED the Idaho-Maryland Gold Mine being reopened by Rise Mining Company.

As a registered voter in Nevada County and a homeowner, I am deeply concerned about the proposed possibility of reopening the Idaho-Maryland Mine. I have downloaded and reviewed the EIR report.

Here are the reasons why I oppose reopening the Idaho-Maryland Mine:

Ind 727-2

MINE WASTE and WATER POLLUTION
Gold mining produces huge amounts of mining waste, some of which contain heavy metals and other toxic substances. Both waste rock and tailings threaten to pollute groundwater and surface water. Our community is still dealing with arsenic and the leaching of heavy metals from the Gold-Era days. And now, Rise, a Canadian company comes along and wants to produce even more mine waste for 80 more years: 182,500 tons per year! More tailings that polluting big rig diesel trucks will need to haul away with the potential for leaching more arsenic into our waterways for generations to come. I also find it interesting that the Canadian Company is choosing to open a mine in the US (California) instead of Canada. I know that Canadian

Ind 727-3

INCREASE GREENHOUSE GAS EMISSIONS
Diesel haul trucks, up to 100 round trips PER DAY will be needed to transport this mine waste, significantly increasing the amount of air pollution and greenhouse gas emissions into our community's air.

Ind 727-4

TRAFFIC AND SAFETY
The increase of vehicles, specifically 20-ton haul trucks, up to 100 round trips per day on the Cedar Ridge Y (Brunswick Road and Highway 174) intersection will be significant and unavoidable! This is according to the EIR report. Are the supervisors aware that the Union Hill Elementary School District, with over 800 students and staff, are within the boundaries of these dangerous roads and intersections? The same intersection and roads that school buses and parents use to transport students to school five days a week, twice a day. The same roadways that the EIR report states will have significant and unavoidable harm even after implementation of feasible measures. Reopening the Mine will threaten the safety of our children, their parents, and the over 100 school staff members from the nearby Union Hill School.

I am in attaching a copy of information I researched regarding the effects of mines on the environment, our communities and the world.

Is the pursuit of gold really worth so much environmental destruction AND the real potential for significant and unavoidable auto accidents between 20-ton trucks and children in cars/buses?
I think not. Please vote NO to Rise Mining Company.

Sincerely,

Sheri Hoss, 118 Margretta Ct. Grass Valley, CA 95945

BLOG ENTRY
5 February 2019, 1.26pm EST https://miningwatch.ca/blog/2019/2/5/behind-glitter-gold-facts

Behind the Glitter: The Gold Facts

THE GOLD FACTS

1. Gold mining has some of the largest human and environmental impacts of all types of metal mining.
2. More than 1 in 4 metal mines in the world (and in Canada) is a gold mine.
3. Top gold producing regions include China, Australia, Russia, USA, Canada, Latin America, South Africa.
4. In Canada, gold surpassed all other types of metals mined and exported in value over the last 10 years.
5. 50-60% of gold mined is for jewellery, 30-40% for banks & investments, 10% for industry and technology.
6. China, India, USA & Europe dominate the $350 billion jewelry market.
7. Some of the largest jewellery retailers in North America include Signet Jewelers, Tiffany, Walmart, Costco.
8. In North America and many parts of the world, mining is the largest source of contaminated solid waste into the environment.
9. Industrial-scale gold mining generates over 20 tons of contaminated wastes for each new gold ring made.
10. Industrial mining also uses large quantities of sodium cyanide – a substance very toxic to living organisms.
11. Artisanal small-scale gold mining is still the largest source of mercury pollution on earth, ahead of coal burning (!!!) – but there are mercury free alternatives.
12. As more accessible and higher-grade gold deposits are mined out, gold mining is expanding into more socially and ecologically sensitive areas, affecting local communities and Indigenous peoples' livelihoods.
13. About 40% of gold mining corporations are headquartered in Canada, 20% in Australia, 15% in the USA and Europe, and operate across the planet (eg: 45% of companies in Latin America are Canadian).

Ind 727-5

14. Increased mechanisation and automation mean that gold mining represents only about 15,000 direct jobs in Canada, but millions globally – mostly artisanal and small-scale miners.
15. While the mining sector accounts for about 20% of all Canadian exports, it represents only 3% of Canada's GDP – and gold mining a fraction of this.

Sources:

- *Commission for Environmental Cooperation (CEC) 2018, North American Pollutant Releases and Transfers, http://cec.org/tools-and-resources/taking-stock/taking-stock-online-north-american-industrial-pollution*
- *Common Objective 2018, The Size of the Global Jewellery Market, https://www.commonobjective.co/article/the-size-of-the-global-jewellery-market*
- *Environmental Protection Agency 2013, Mercury Emissions: The Global Context, https://www.epa.gov/international-cooperation/mercury-emissions-global-context*
- *IBEF 2019, Gems and Kewellery Industry Analysis, https://www.ibef.org/industry/gems-and-jewellery-presentation*
- *IBIS World 2019, Jewelry Stores Industry in the US, https://www.ibisworld.com/industry-trends/market-research-reports/retail-trade/clothing-accessories-stores/jewelry-stores.html*
- *Infomine Database 2019, http://www.infomine.com/, consulted on Feb.1st 2019*
    - *Over 36,000 mine sites in the database: 13,000 gold sites and 5,500 gold-copper sites; 6,100 active mine and mine complex sites (over 1,600 for gold), and about 2,300 in production (over 800 for gold). In Canada: over 300 active mine and mine complex sites (144 for gold, and about 55 in production).*
    - *Over 14,000 companies in the database, 3,640 in Canada (including about 3,000 globally for gold, 1200 listed as gold in Canada, 650 in Australia, 200 in the USA, 200 in Europe, 200 in Latin America, 200 in Asia, 150 in Africa, 90 in UK, 50 South Africa.*
- *Mining.com 2018, Top 10 largest gold companies in 2017, http://www.mining.com/worlds-top-10-largest-gold-mining-companies-2017/*

- *Mining of Association of Canada 2017, Mining Facts and Figures, http://mining.ca/sites/default/files/documents/Facts-and-Figures-2017.pdf.*
    - *Total of about 200 major active mine sites in 2016, including 17 active gold mines in Ontario (excluding polymetallic mines) and 24 total metal and diamond mines; 10 active gold mine sites in Quebec; 5 polymetallic gold mines in B.C.; 3 active gold/polymetallic mines in NFL; 2 polymetallic mines in MB; 2 in SK; 1 polymetallic mine in YK; 1 in NV; 1 polymetallic mine in NB.*
- *Mining Association of Ontario 2018, Mining Operations Map, https://www.oma.on.ca/en/ontariomining/map.asp*
- *National Pollutant Release Inventory 2017, Government of Canada, https://pollution-waste.canada.ca/national-release-inventory/archives/index.cfm?lang=En*
- *NRCAN 2018, Annual statistics for mineral production, http://sead.nrcan.gc.ca/prod-prod/ann-ann-eng.aspx*
- *NRCAN 2018, Gold Facts, https://www.nrcan.gc.ca/mining-materials/facts/gold/20514*
    - *Canadian mines produced an estimated 176 tonnes of gold in 2017, an 80% increase since 2008.*
    - *Gold is Canada's most valuable mined mineral, with a production value of $8.7 billion in 2017.*
    - *Ontario and Quebec together accounted for more than 70% of mined gold production in Canada, followed by British Columbia, Nunavut, Manitoba, Yukon, Saskatchewan.*
    - *The Bank of Canada no longer holds gold as part of its international reserves. This is the result of a Government of Canada decision to diversify its portfolio by selling its physical commodities and investing in financial assets that are easily tradable.*
- *NRCAN 2018, Minerals and the Economy, https://www.nrcan.gc.ca/mining-materials/facts/minerals-economy/20529*
- *Statista 2016, Largest jewelry markets worldwide in 2016, by country (in billion U.S. dollars), https://www.statista.com/statistics/718856/largest-jewelry-markets-by-country/*

- *Statista 2017, Top Jewelry retailers in the USA in 2017, https://www.statista.com/statistics/591814/sales-of-jewelry-retailers-in-the-us/*
- *Statista 2019, Luxury Jewelry worldwide, https://www.statista.com/outlook/21020200/100/luxury-jewelry/worldwide*
- *USGS 2018, Statistics and Information about Gold, https://minerals.usgs.gov/minerals/pubs/commodity/gold/*
- *World Gold Council 2019, https://www.gold.org/*
- *World Top Exports 2019, Canada's Top 10 Exports, http://www.worldstopexports.com/canadas-top-exports/*

INDIVIDUAL LETTER 727: SHERI HOSS

Response to Comment Ind 727-1
This comment is introductory in nature. The commenter's opposition to the project is noted for the decision makers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 727-2
The commenter states that the project will produce mining waste that will pollute groundwater and mine water. The commenter is referred to Master Response 8 - Mine Waste Characterization and Master Response 35 - Discharge to South Fork Wolf Creek. The commenter also states that the mining waste will need to be hauled by polluting diesel trucks. Chapter 4.3 of the DEIR analyzes air quality, including associated with haul trucks, and found the project's impacts to be less than significant after mitigation. (DEIR, Impacts 4.3-1 and -2.)

Response to Comment Ind 727-3
The commenter states that diesel haul trucks needed for the transport of mine waste will significantly increase air pollution and GHG emissions. Chapter 4.3 of the DEIR analyzes air quality, including associated with haul trucks, and found the project's impacts to be less than significant after mitigation. (DEIR, Impacts 4.3-1 and -2.)

Response to Comment Ind 727-4
The commenter mistakenly states that the trucks used for hauling engineered fill to the Centennial Industrial Site will impact the Brunswick Road/State Route 174 intersection. Truck traffic from the project would not use the Brunswick Road/State Route 174 intersection. The commenter is referred to Figure 3-13 of the DEIR. Traffic impacts are analyzed in Chapter 4.12 of the DEIR.

Response to Comment Ind 727-5
The commenter refers to a blog post which discusses the gold industry in general. This comment does not pertain to the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Individual Letter 728

From: Sheryl Luxon <sherylllux@gmail.com>
Sent: Monday, April 4, 2022 10:31 AM
To: Idaho MMEIR
Subject: Rise Gold Mine

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SLEEP

Ind 728-1

Studies have proven, without a doubt, that sleep is as necessary to optimal health as is pure food and water. Poor sleep, or lack of sleep, detrimentally affects a persons health. It also adversely affects cognition, heart rhythms and the immune system.

As a Grass Valley resident, and a native California retiree, I live on a busy road that has school buses, garbage trucks, semi's and regular traffic. It is not my first choice to live here, but I am lucky to live here as my retirement income does not allow for market rate rent. I live in a senior community, tax deferred, and my rent is somewhat controlled and reasonable. It is not an option to move.

Studies have also proven that noise, exhaust and dust particles contribute to Dementia and Alzheimers. I am 30' from the road. Lucky for me, the traffic quiets down after 9 p.m. and starts again at 6 a.m.. The weekends actually are quiet enough, at times, to hear the birds and resident Red tail Hawk that reside in the forest of East Bennett Street.

Which brings me to the plans of Rise Gold to run their dump trucks 24/7 on various residential roads, and Hwy. 49, which disects our city of Grass Valley where hundreds of residents will be captive to the noise, exhaust and dust particles spewed from Rise Gold's dump trucks.

Lastly, the study that proves our brains need silence to regenerate, as the brain is still active during sleep, leaves no doubt that the health impacts of Rise Gold's plans to run dump trucks 24/7 will be detrimental to hundreds of Grass Valley, and surrounding areas, physical and mental health.

Therefore, the conclusion to Rise Gold reopening the mine is a resounding NO MINE!

Sincerely,

Sheryl Luxon
sherylllux@gmail.com
115 Union Jack St. #3
Grass Valley, CA 95945

1

INDIVIDUAL LETTER 728: SHERYL LUXON

Response to Comment Ind 728-1

The commenter states that the noise impacts from truck traffic will interrupt the sleep schedule of the nearby residents. The commenter also states that exhaust and dust particles contribute to dementia and Alzheimer's disease. Regarding the sleep disturbances, the commenter is referred to Response to Comment Grp 21-130. Regarding the project's impacts to air quality, the DEIR found that all impacts will be less than significant after mitigation. (DEIR, Impacts 4.3-1 and -2.) The commenter's general opposition to the project is noted for the decision makers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 729

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

January 18, 2022

Dear Commissioners:
Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned resident of Grass Valley, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter.

Ind 729-1

I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent and misleading in their insensitivity to the environmental concerns we citizens have. Even though I have not gone over the EIR thoroughly yet, so far it seems they fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses:

Ind 729-2

- Air Quality – we already have a compromised air quality due to the pollution from the Sacramento Valley and fires. Any more and I will leave!

Ind 729-3

- Traffic – 100 large, heavy trucks moving rock etc. every day from the site down through the busy shopping area on Brunswick to Hwy 49 and all the way to Sacramento and beyond is inconceivable and intolerable for these reasons:
  - Traffic snarls potentially
  - Damage to road surfaces
  - Noise all along the route
  - Fossil fuel emissions adding to greenhouse gases
  -

Ind 729-4

- Water usage – more when we already have a shortage from drought is unacceptable.

Ind 729-5

- River pollution is possible from the water used in mining.

It is up to YOU as the Planning Commission to protect the citizens and keep this very special Foothills habitat beautiful and healthy. YOU are responsible for protecting our environment. Besides, there seems to be very little economic value from the project to local people.

Ind 729-6

I trust you will value my input and the comments from thousands of other residents, and see through the Rise Mine claims geared at profit to the truth of the hazards this mine might bring.

Sincerely,

Shirley Freriks 144 Sierra Blanca Ct, Grass Valley 95945…530-446-6446 sfreriks@mcn.org

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

INDIVIDUAL LETTER 729: SHIRLEY FRERIKS

Response to Comment Ind 729-1
The commenter does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Response to Comment Ind 729-2
For the generally noted air quality concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy.

Response to Comment Ind 729-3
Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Regarding damage to road surfaces, Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the Project Driveway and Brunswick Road. (DEIR, p. 4.12-91.)

The analysis of greenhouse gas emissions in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, includes mobile sources. Please refer to Chapter 4.3 for the detailed evaluation.

Response to Comment Ind 729-4
Please see Master Response 16 – Drought and Climate Change, and Chapter 4.8, Hydrology and Water Quality, for additional information related to drought conditions and water usage, respectively.

Response to Comment Ind 729-5
Please see Master Response 35 – Discharge to South Fork Wolf Creek and Chapter 4.8, Hydrology and Water Quality, for additional information related to water pollution.

Response to Comment Ind 729-6
The comment does not address the adequacy of the DEIR. The comment has been noted for the record and forwarded to decision-makers for their consideration.

Individual Letter 730

From: Shirley Williams
To: bdofsupervisors
Subject: Fwd: Received the Draft Enviroment Impact Report
Date: Wednesday, March 23, 2022 8:27:35 PM

Dist 3

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Sent from my iPad

Begin forwarded message:

From: Shirley Williams <sjwilliams60@yahoo.com>
Date: March 23, 2022 at 6:44:52 PM PDT
Subject: Received the Draft Enviroment Impact Report

Received the Draft Enviroment Impact Report

Ind 730-1 About this report that came out. How is a normal,person supposed to understand this report. Of course not. but I have a nephew that works in the gold mine industry. He has worked all over the world in administration. I had him take a look. He can't understand why anyone would think it is a good idea to open a gold,mine in the middle of a small town. He read all the reports. He did say California has some of the strictest regulations. Did not believe California would allow this.

My first question is why we would agree to this site as light industrial to be changed for one person who once to open a gold mine that has been closed for 50 years in the middle of our town.

Ind 730-2 I am wondering why anyone would consider allowing this person to open anything here when they still have a court case pending in Canada. They left a lot of damage from their gold mine they were running until they were ordered to

close it down. What they did to the people there they filed bankruptcy and came here to raise a lot of problems. I also would like to know if their company is located in Nevada but they are here. If this is true why is their company not registered in California. Has to be a reason. I would like to know what it is.

Ind 730-3 I live about a block from this mine. I have lung cancer. I have spoke to my doctor about this problem. He said all the crap that this mine would put out will be very bad for me. The trucks throwing out all the diesel fumes would be bad for everyone but it could be deadly for me so I want this on record.

Ind 730-4 The constant noise from this mine would , I am sure, destroy my peace and quite that I am entitled to. I will not even be able to sit out on my deck which is the enjoyment I am entitled to.

Ind 730-5 I have to travel Brunswick every day for doctors, grocery stores, meds. Will I have to sit behind one of these diesel trucks breathing their crap when I need to go someplace.

Ind 730-6 They talk about these high paying jobs. What jobs. I have heard nothing about what jobs these are and what are they are being paid. For instance a Truck Driver - $15.00 hour. Working deep in a hole - $20.00 hour. I don't know what jobs they are talking about but I have seen nothing that says what the jobs are or what they would be paid. They should have to list these jobs as they keep saying these jobs will pay $100,000 a year. What Jobs.

Ind 730-7 This company has already violated rules in the beginning and the County did nothing.

Ind 730-8 What about our water. Does the powers that be not listen to the news. Our water situation is not very good. We are being ask to conserve water because we are in a drought that is the worst we have had many, many years. Now you want to,allow this mine that no one wants to drain our wells, hook people up to NID who ask for conservation. What about all the wells that NID WILL NOT BE ABLE TO REACH when all these other wells go dry. Are you going to guarantee that these people will not lose their water.

Ind 730-9 How many on the board of supervisors will be living near this site. I don't think any of you will or would. There is so much that can be said about this project that is wrong but I will close with this. I read about "Rise Gold Valley which seeks to open the Mine has stated the project benefits far out weigh the impacts". Really someone thinks that having lung cancer and the crap that the mine would put into my lungs is just to bad for me. Really. thanks but no thanks.

Sincerely
Shirley Williams
14204 Tim Burr Lane
Grass Valley, California

Sent from my iPad

INDIVIDUAL LETTER 730: SHIRLEY WILLIAMS

Response to Comment Ind 730-1
The comment does not address the adequacy of the DEIR, but rather expresses opposition and general concerns related to the proposed project. Please see Master Response 1.

Response to Comment Ind 730-2
Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 730-3
The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the EIR.) As stated on page 27 of the HRA (Appendix E1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HRA presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR. Several commenters identified not being able to see the risk of the HRA visually. Isopleth figures were developed in response to these comments, which show where the project's emissions would travel. Please see Dudek Memo – Isopleths attached to the Final EIR as Appendix K.

Response to Comment Ind 730-4
Noise is addressed in Chapter 4.10. Based on the project-specific noise analysis, which was independently reviewed by the County's third-party noise consultant, none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Response to Comment Ind 730-5

Please see Response to Comment Ind 730-3.

Response to Comment Ind 730-6

The comment does not address the adequacy of the DEIR. Jobs and other social topics are outside the scope of CEQA – please see Master Responses 1 and 2.

Response to Comment Ind 730-7

The comment does not address the adequacy of the DEIR and lacks specificity. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 730-8

Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 730-9

The comment does not address the adequacy of the DEIR. The comments concerns and opposition to the proposed project have been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 731

From: stacy beilman
To: Idaho MMEIR
Subject: Mine
Date: Sunday, February 20, 2022 7:10:30 PM

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Ind 731-1

In my opinion, we do not want this mine in Grass Valley. Bottom line, the negatives far outweigh the positives. I see no reason whatsoever to open up this mine.

Thank you
Stacy Beilman
Sent from my iPhone

INDIVIDUAL LETTER 731: STACY BEILMAN

Response to Comment Ind 731-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 732

From: stacy beilman <stacylbeilman@gmail.com>
Sent: Sunday, January 23, 2022 1:34 PM
To: Idaho MMEIR

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Ind 732-1 To Whom it May Concern, I am against the mine as I think the negatives outweigh the positives.
Thanks, Stacy Beilman, 10870 Newtown Road, Nevada City

INDIVIDUAL LETTER 732: STACY BEILMAN (2)

Response to Comment Ind 732-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 733

From: Stefanie Martinez <stefaniemartinez36@gmail.com>
Sent: Monday, April 4, 2022 2:43 PM
To: Idaho MMEIR
Subject: No Mine!!!

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Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170

Nevada City, CA 95959-7902
(530) 265-1423

My name is Stefanie Martinez, and I am a resident of the Grandview Terrace neighborhood. I live at 10910 Drift Alley, Grass Valley and have been a homeowner here since 2011. I have grown up in the Grass Valley community since age 7, completing all of my schooling and college here, contributing to the local workforce, and deciding to purchase my home at the age of 25 further committing my ties to this community. I have always felt incredibly fortunate to call this place my home and have chosen to build my life here as I place a very high value on the natural beauty and peaceful quality of life that has been remarkably gifted to this area. Not only is Grass Valley considered a unique and beautiful paradise for its residents, it is also what continues to draw its tourists and visitors, which has a significant contribution to our local economy. Furthermore, I feel just as significant in importance is the local wildlife habitat and natural ecosystems in which we share our environment with.

Ind 733-1

I'm writing all of this with the point to establish my major concern with the reopening of the Idaho Maryland Mine by Rise Gold and its potential harmful impacts and toxic destructive inevitability in my hometown. It is a historically dangerous and hazardous operation and highly pollutant process. I understand that some of these concerns have been under evaluation and proposed to be mitigated within the DEIR. I strongly feel that the DEIR is incomplete and inadequate by far in order to sanction the extraordinary negative impact of this destructive business on this community. Please do not allow this to happen. I feel an extraordinary amount of helplessness as I understand this decision falls within the hands of a few. I live within a -too close for comfort- proximity to the mine site and I have enormous concerns for how this is going to affect me, my family, friends and neighbors health and quality of life. I think that it would be a huge mistake to allow for this operation to exist right within the proximity of so many residents. There are numerous concerns that I have with the many aspects of the potential impacts.

- Pollution of Water

Ind 733-2

Water IS gold. It is our most valuable resource. We need to preserve and protect it. What is essentially purposefully contaminated water being treated and released back into the environment simply spells out "bad idea". Room for accidents and error should not be ignored and dismissed. I am very uncomfortable with the track record of Ben Mossman's former mining business venture on Banks Island in Canada, where accidends did happen and contamination was found in the aftermath, left behind undealt with. I do not want to see this happen in my community, in our water streams. Wolf Creek is a life source to many ecosystems and animals throughout our county, parts of which run through properties where children play. Not to mention the numerous wells of which are located within the surrounding area supplying water for people and their properties. I do not want to see a repeat of the devastating and irreversible effects

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of the North San Juan Siskon Mine. Of course these types of occurrences are never intended, but this industry has proven time and time again that disaster lurks heavily, and with nearly impossible irreversibility.

Ind 733-3

-Air pollution
The proximity of which mine dust and toxic particulates will be disrupted and expelled into the atmosphere near my own residence is highly concerning and leaves me feeling anxious about what effect it could have on my health and everyone around me who will be living and breathing this air EVERY day of my life.

Ind 733-4

-Noise Pollution
I have concerns for the amount and level of noise that will be produced by the equipment and operation of the mine. As mentioned before, one of the highly desirable qualities of this area is its quiet, small town, peaceful environment. I am afraid that the intrusion of this industry will depreciate this value significantly.

These are just a few of my main concerns regarding the reopening of the Idaho Maryland mine. Please, please do not allow this in our community. The DEIR does not mitigate enough concerns of so many experts and of our community members. This dirty industry has no place in our future.

Thank you for your time,
Stefanie Martinez

INDIVIDUAL LETTER 733: STEFANIE MARTINEZ

Response to Comment Ind 733-1

The commenter expresses concern that the DEIR is incomplete, but does not provide specific examples that would allow for a detailed response. Quality of life concerns are outside the scope of CEQA – please see Master Response 1. The commenter's concerns are not for the record and have been forwarded to the decisionmakers for their consideration. Please also see the below responses to more specific comments.

Response to Comment Ind 733-2

Regarding water pollution concerns, please see Master Response 35 – Discharge to South Fork Wolf Creek; regarding well concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells; and regarding applicant concerns, please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 733-3

Please see Chapter 3, Air Quality, Greenhouse Gas Emissions, and Energy, for additional information related to air pollution. The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant.

Response to Comment Ind 733-4

Please see Chapter 4.10, Noise and Vibration, for additional information related to noise impacts. Based on the project-specific noise analysis, which was independently reviewed by the County's third-party noise consultant, none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

The commenter's opposition to the proposed project is noted for the record and has been forwarded to the decision-makers.

Individual Letter 734

From: Stephanie Almanzar <steph.almanzar@gmail.com>
Sent: Monday, April 4, 2022 12:30 PM
To: Idaho MMEIR
Subject: Comment against the reopening of the Idaho-Maryland mine

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To whom it may concern,

My name is Stephanie Almanzar and I live in Grass Valley, CA District 1. I am writing to comment on the Rise Gold's application to reopen the Idaho-Maryland mine.

I moved to this area in 2020 because I wanted to be close to all the beautiful nature this area provides. As an entrepreneur working in the online space it was an easy yes to make the decision to move here with my partner from San Francisco.

One of the things that stood out to me was the community here. I could tell that the people that live here love this area deeply and show their care by keeping this area beautiful and clean. One place I noticed this was at the Yuba river. Noticing how locals clean up trash left by those who may not have the amount of reverence and respect for this area as the people who live here do. I have found this area deeply nourishing to my soul and would hate to see something so destructive as the mine start to decrease the quality of life in this precious area.

Ind 734-1

I believe that the county needs to take a look at the bigger picture surrounding the potential for reopening the mine. Looking at the impact it will not only have in the immediate future for the quality of life for those already living here but also the for the future generations to come. Quality of life is the most important thing for people to have the energy and resources to create and give back to the community. Reopening a mine owned by people who have no respect or reverence for the land here is not the answer to increase the quality of life for those of us who actually live in the area, those of us who love living here and respect this land as sacred.

Bringing in traffic, noise, and destruction would not only deter people from coming to visit and boost the economy it would drive those of us who love living here away. They say that this mine would boost the economy but I believe that instead it would deplete the lands natural resources and drive people away from this area. And so I urge you to do a legitimate and sound economic analysis in the DEIR before making any final decisions.

I also believe that it is important to look at Rise Gold as a company. Where do their interests lie? Do they actually care about those of us who live here and the impact this will have on us? Are they reputable? Have they successfully opened a mine and received profit? With only minimal research it is apparent that Rise Gold is all talk, shiny marketing, and empty promises. They are a 14 year old company and have never opened a mine or received profit. The CEO is known to have failed in their last venture. Leaving polluted tribal waters and rid themselves of responsibility, leaving Canadians with the price to pay for their failures. Is this really the type of company that will serve this community? I think not. I believe there is more in depth scrutiny necessary to make a sound decision on this issue. And I believe that if there is sound research done that who ever is reading this will find that opening this mine would be the biggest mistake this county can make for its people and this scared land we live on.

Ind 734-2

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Thank you for receiving me.

With sincerity and hope,

Stephanie Almanzar

INDIVIDUAL LETTER 734: STEPHANIE ALMANZAR

Response to Comment Ind 734-1

Quality of life and economic concerns are outside the scope of CEQA - please see Master Responses 1 and 2. Regarding the commenter's general traffic concerns, please see Chapter 4.12, Transportation of the DEIR. Regarding the general noise concerns, please see Chapter 4.10, Noise and Vibration, and Response to Comment Ind 733-4.

Response to Comment Ind 734-2

Please see Master Response 3 – Operator Responsibility.

Individual Letter 735

From: Stephanie Steyer <sjsteyer@icloud.com>
Sent: Wednesday, March 23, 2022 12:34 PM
To: Idaho MMEIR
Subject: NO to the reopening of the Mine!

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Dear Mr. Matt Kelley:

I am writing today as a concerned citizen of Nevada County. I am a home owner and I live in Rough and Ready. I've been in this area for 22 years. I am adamantly opposed to the reopening of the Idaho-Maryland mine. We don't need this in our community. Why do we want to destroy our water supply or the beauty of this place any more with mining?! The amount of jobs this reopened mine promises will NOT off-set the environmental damage.

Ind 735-1

It is simply **not** worth it to vote yes on reopening the mine. Please add my letter of opposition.

Thank you.

Sincerely,
Stephanie Steyer
13672 Quail Alley
Rough and Ready, CA 95975

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INDIVIDUAL LETTER 735: STEPHANIE STEYER

Response to Comment Ind 735-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project, which has been noted for the record. Please see Master Response 1. Regarding water supply concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Individual Letter 736

March 25, 2022

Stephen J. Baker
13975 Wings of Morning Drive
Nevada City, California 95959

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, California 95959-7902

Dear Mr. Kelley:

I am commenting on the risks on private domestic water wells created by the proposed Rise Gold mining project.

Ind 736-1

As a resident of Nevada County, I live on upper Banner Mountain and have used a groundwater well for 26 years. My background is unique to the issue of private domestic wells. I am a California Registered Geologist and Certified Hydrogeologist, have been doing hydrogeology for 42 years, completed a 10-year groundwater study in Nevada and Placer Counties that looked at domestic well vulnerabilities in fractured rock environments and submitted the draft environmental impact report (DEIR) comments on behalf of the Banner Mountain Home Owners Association when this mine was proposed to be reopened by Emperor Gold in 2009.

Based on what I have read in the draft environmental impact report (DEIR), I am concerned for our community. Dewatering the mine and its impacts on domestic wells are currently undefinable, unpredictable, the fundamental dataset is biased and monitoring data is not long enough in duration and too low a resolution to provide useful information.

First, I will explain what is wrong or missing from the DEIR and then I will explain what is needed.

Rise Gold relies on four datasets to generate an opinion on private domestic well vulnerability. The first dataset was generated by Emperor Gold. Emperor Gold's groundwater monitoring data ranged from 1995-2001 & 2003-2007. This well monitoring dataset is too sparse; 1) not long enough time period of monitoring (this is an 80-year project) and 2) data time intervals are once a month.

Ind 736-2

The second dataset consists of precipitation data and water levels in Rise Gold mine shafts. Rise Gold comments that water levels in mine shafts are unaffected by seasonality therefore wells are safe. They compared daily precipitation with fifteen water level readings in a sixteen-year period. This is the same issue as just mentioned. It is not possible to see trends because you miss the aquifer responses as a result of the low-resolution dataset. This dataset is also too short in duration. Conditions also change when going from steady state to transient. It is noted that our community has had more severe droughts since 2007 which may have created a more pronounced impact on groundwater this is not reflected in available data. We will likely be experiencing much more extreme droughts in the future.

Ind 736-3

The third dataset was generated from a computer numeric groundwater model. This is the wrong tool for answering the question of dewatering impacts in a fractured rock system. Numerical computer models are great tools that provide very useful projections in porous aquifers and other aspects of this project. But this area is a fractured rock aquifer and fractures are not mappable. Groundwater flow paths are not predictable with specificity. The model generalizes predictions on domestic well impacts. It's the details that matter. We need much more detail.

Lastly, Rise Gold is following a conclusion that the United States Geological Survey (USGS) made in 1984 regarding groundwater in fractured rock areas of California. USGS stated that well yields decrease with depth. The statistics that were quoted in the Rise Gold report were:

- 70% of the wells that are 215 feet in depth or less yield greater than five gpm and
- 75% of the wells that are deeper than 215 feet yield less than five gpm.

These datasets support Rise Gold's conclusion that mine dewatering is not going to impact wells. Wells are less productive as you drill deeper.

Ind 736-4

This conclusion is incorrect because the bias has not been recognized and adjusted in the data. Let me explain. The motivation of property owners is to drill until you find enough water for their property. Sometimes this is less than 215 feet of drilling and sometimes it is deeper. If you find water at a shallow depth, you stop drilling, even though deeper groundwater may also be available. Rise Gold's estimate of existing deep water are too low. Greater than 25% of the deep wells yield greater than five gpm and that doesn't include properties that have not drilled a well. Discrete flow pathways do exist at depth and can be quite robust to a well owner. There are more areas of deep groundwater than estimated by Rise Gold. The numbers are wrong.

OMISSION OF IMPORTANT DATA

The number of new wells has increased since the 1984 USGS report and the Emperor Gold hydrologic reports. Ask any local driller and County Staff. There is more reliance on wells today than ever before. Risk to losing groundwater supplies are also greater today because of the increase in drought intensity and length and population increases. The deepening of wells and new replacement wells have also increased during the last fifteen years. Again, ask local drillers and your County Staff.

My 10-year groundwater study in Nevada and Placer counties concluded that domestic wells are vulnerable to losing their supply however wells are uniquely different from one another. Specific well vulnerability characteristics are only recognized by monitoring the specific well.

Ind 736-5

The bottom line is data used by Rise Gold is outdated and biased. Domestic wells are already vulnerable and mine dewatering increases that vulnerability. A much stronger and more realistic analysis is needed.

Now I will explain what is needed. There are two main questions:

1. Does groundwater flow into the dewatered zones of the mine within an eighty-year period of time?
2. If so, what flow path is groundwater travelling to reach the mine workings, if at all?

The first question is answered by age dating the mine shaft water at several discrete depths. You may consider using sulfur hexafluoride (SF6) or chlorofluorocarbons (CFC). If groundwater takes less than 80 years to percolate to the mine workings under today's nonpumping conditions, then, the wells and mine are vulnerable to drought and dewatering of the mine. It becomes possible that mine dewatering would divert some of the groundwater away from domestic wells. We just don't know which wells and which groundwater flow paths are being used by domestic wells. I have age dated groundwater in the granites and metavolcanics found on the San Juan Ridge. Groundwater was estimated to be fourteen years to forty-six years old. I would expect similar age water at Rise Gold's mine.

Ind 736-6

In order to identify which well is impacted, we need to monitor specific wells at high resolution. This needs to start now. Background data is critical. Establishing background water behavior requires several years of monitoring. This is an essential monitoring criterium. Without adequate background data, evaluation of mine impacts on wells will become a hundred percent arbitrary decisions that is not relevant to the real problem. YOU NEED TO GENERATE ADEQUATE BASELINE DATA NOW.

Ind 736-7

I have only addressed water availability but I will say one thing about water quality. Dewatering is going to change groundwater flow paths and that can impact water quality. Different groundwater flow pathways sometimes encounter diff. rocks/chemical conditions. The system is dynamic. Groundwater monitoring must include both water level measurements and water quality analyses. Establishing background conditions is fundamental to building a strong and pragmatic well protection and contingency program.

CONTINGENCIES

Ultimately, contingencies will need to be comprehensive, well-funded and logistically sound. Don't waste money on the fifteen nested groundwater monitor well locations recommended in the DEIR. Focus on monitoring existing wells as your monitoring points.

Ind 736-8

Bringing NID into potential impacted neighborhoods early is the right thing to do, but, in many cases, you will not know who will be impacted until the last minute and that won't provide enough time to expand Nevada Irrigation District (NID) infrastructure into the entire impacted area. This is a problem. I am not sure how it can be answered.

My suggestion regarding the groundwater monitoring needs is to create a strategic, tiered groundwater monitoring plan to identify problems before they become critical. This is very different from the monitoring proposed by Rise Gold.

Construction of water pipes into each area that is predicted to have water impacts before the impact creates dysfunction. The zone of dewatering influence will not become known until dewatering occurs. The radius of influence will become more unpredictable because of seasonal precipitation changes and the expansion of mine working as related to unexpected encounters with secondary porosities of rock formations through time. Significant funding will be needed to anticipate responses to the expanding radius of domestic wells adversely impacted by mine dewatering. This will likely be costly.

Ind 736-9

Unfortunately, a couple conditions cannot be mitigated. **Rise Gold will handicap our community's ability to respond to future droughts.** Domestic well owner's response to drought is to deepen their wells or drill a new one. After Rise Gold dewaters the deeper well production zones, property owners will be drilling into a dewatered area. Eighty years is a long time to dewater an aquifer. This will impact our great grandkids.

As we stand now, our communities are not prepared to lose their groundwater supply especially if Rise Gold adds to the vulnerabilities of domestic well users.

Ind 736-10

The second handicap is the loss of the domestic well owner's water right to their groundwater resource. The dewatered mine water is public water that property owners can use. There is a caveat. The use must be reasonable and for use on their property. Mine dewatering will be occurring for eighty years, not five, and during that time, Rise Gold will remove water from properties other than their own. It is not reasonable or of value to domestic well owner properties. If water is transported to an unknown location down-gradient, the beneficial uses of that water need to somehow be returned to the domestic well owners. This large diversion of groundwater out of the subbasin will eventually be viewed as an overdraft of the subbasin. Aquifer characterization would be recognized as over drafted if the demand for water exceeds the volume of water that fills the aquifer each year.

If the overdraft in the subbasin is not corrected, the domestic well owner's very strong Overlying Groundwater Right could be lost by prescription. Imagine, water is there, the quality is perfect but the domestic well owner no longer has a right to use the groundwater.

This becomes possible because Rise Gold is pursuing 80 years for pumping, water rights in CA are going to change significantly (they already are) and predictions that drought will worsen and will create more

adversarial water conflicts in Nevada County communities. Officially recognized over drafted basins could develop. Prescription will become a reality in our communities if we are not careful. This is bad for the property owner and bad for the county.

Our wells are already vulnerable. We don't want to be handicapped. We need to be better prepared.

The monitoring and contingencies, as stated in the draft environmental impact report are not effective enough to safeguard our communities.

Respectfully submitted,

Stephen J. Baker
California Registered Geologist (No. 4354)
California Certified Hydrogeologist (No. 181)
530.205.6388

INDIVIDUAL LETTER 736: STEPHEN BAKER

Response to Comment Ind 736-1

The commenter asserts that the data used by the DEIR groundwater analysis is too sparse and does not cover a long enough period. The groundwater monitoring data referred to in this comment are plotted on hydrographs in Appendix B of the *Groundwater Hydrology and Analysis Report*, which is Appendix K.2 of the DEIR. For all but a few wells, the data show consistent cycles without any long-term increasing or decreasing trends throughout the almost 10-year period over which data were obtained, as discussed on DEIR page 4.8-12. It would not be reasonable to expect data collection over an 80-year period prior to this project. Review of Figure 3-4 of Appendix K.2 of the DEIR indicates that during this 10-year period, the annual water-year rainfall varied from 85.98 inches in 1995 to 30.73 inches in 2001. These values are within the 98th percentile and the 6th percentile, respectively, of the rainfall variation shown for the period from 1967 to 2018 on Figure 3-4 of Appendix K.2. Therefore, the monitoring occurred across a timeframe during which there were substantial variations in the rainfall amounts from year to year.

Monitoring of individual private wells at a greater frequency than that recorded for the monitoring from 1995 to 2001 and 2003 to 2007 may show short periods during which the water level was lower than the minimum recorded value in some wells, but that would be due to pumping of the well itself and not an indication of the actual water level within the fractured bedrock. More frequent monitoring in the past would not alter the understanding of the historic baseline of the groundwater elevations in the region.

Furthermore, the DEIR concludes, on page 4.8-66, that the potential impacts to groundwater supplies in private wells would be significant. Additional data from existing private wells would not alter that conclusion or the need for mitigation. The groundwater analysis and underlying data were reviewed by the County's water supply experts, who concurred that the analysis was accurate and that the impacts would be less than significant after implementation of mitigation. As such, the groundwater analysis constitutes substantial evidence to support the DEIR's conclusions.

Response to Comment Ind 736-2

The commenter asserts that the data used in the DEIR when comparing precipitation data and water levels in the mine shafts is inadequate because of too short of duration and too few readings, to conclude that wells are "safe." This comment mischaracterizes the evaluation presented in the DEIR, which does not conclude that wells are "safe." As noted in the Response to Comment Ind 736-1, above, the DEIR concludes, on page 4.8-66, that the potential impacts to groundwater supplies in private wells would be significant prior to mitigation. Additional data from existing private wells would not alter that conclusion or the need for mitigation.

It should also be noted that the water level data from the New Brunswick Shaft, as presented on Figure 4.8-5 of the DEIR, varies by less than seven feet, with the exception of one potentially anomalous result. Even considering that potentially anomalous result, the water level in the shaft varies by only 11 feet, in comparison with seasonal variations in the private domestic wells of 10 to 50 feet per year, even though measurements were made during a range of wet years and dry years.

As noted in Appendix K.2 of the DEIR, the water within the shaft and existing underground mine workings are not static. Water from the mine workings is constantly discharging to Wolf Creek. However, the rate at which the water discharges is limited by the rate at which the water can enter the workings through the fractures that have been encountered. The water level in the New

Brunswick shaft is 25 feet to 265 feet below the static water level in the wells in the East Bennett area, indicating that the water can flow out of the drains faster than it can enter the mine. The flow of water into the shafts and through the underground mine workings has also resulted in an existing drawdown cone around the shafts. These dynamic conditions provide an indication of the degree of interconnection between subsurface fractures and the mine workings, and the rate at which water can enter the mine, which is limited. As discussed above, the available data provides adequate resolution to understand the groundwater dynamics and to predict likely impacts based on dewatering. Further, the groundwater analysis and underlying data were reviewed by the County's water supply experts, who concurred that the analysis was accurate and that the impacts would be less than significant after implementation of mitigation. As such, the groundwater analysis constitutes substantial evidence to support the DEIR's conclusions.

Response to Comment Ind 736-3

The commenter asserts that the computer groundwater model is the wrong tool to analyze dewatering impacts in a fractured bedrock system. Please see Response to Comment Ind 232-1. Computer groundwater flow models that are based on the assumption of porous media are widespread in use in fractured bedrock analyses, and are appropriate in the context of the large area analyzed for the project. The upper alluvium and fractured shallow bedrock behave as a porous media on the scale that Itasca modeled for the project. An assumption of a porous media is appropriate given the scale and the objectives of the model. As discussed in the NRC (1996), a document referenced by Dr. Schneiderman in comment 232-1, and presented below:

> The level of detail required in the conceptual model depends on the purpose for which the model is being developed—for example, whether it will be used to predict fluid flow or solute transport. Experience suggests that, for average volumetric flow behavior, predictions can be made with a relatively coarse conceptual model provided data are available to calibrate the simulation model. Thus, a continuum approximation may be used to predict well yields with sufficient accuracy, even if a fracture network is poorly connected.

The continuum approximation mentioned in this paragraph is a porous media approximation. The application of a continuum (porous media) approximation is applicable to mining projects in that it is used generally to estimate flows from the mine and drawdowns in water levels due to dewatering, a situation similar to predicting well yields as discussed by the NRC (1996). The approach followed by Itasca is appropriate and is supported by the literature and common practice in the hydrogeology field.

Response to Comment Ind 736-4

The commenter asserts that the DEIR is wrong in concluding that there is less groundwater present at deeper depths below surface, and the DEIR is mistaken to rely on a USGS conclusion from 1984 on that issue. The DEIR does not rely solely on the 1984 USGS study (Page et al.) regarding well yields related to depth. Substantial evidence from California Department of Water Resources Well Completion Reports was also considered to evaluate how water production changes with depth from wells within the fractured bedrock. That additional evidence considered in the DEIR is illustrated on Figures 3-8, 3-9, and 3-10 in Appendix K.2 of the DEIR. The commenter is unclear on what depth range is implied when referring to "deep wells," however, as noted in Appendix K.2 (at page 33), below a depth of 450 feet, the maximum pumping rate was only four gallons per minute (gpm).

Response to Comment Ind 736-5

The commenter asserts that domestic wells are vulnerable to losing their water supply, and that the data used by the EIR is outdated and biased. As noted in the Response to Comment 1 of this

letter, the DEIR concludes, on page 4.8-66, that the potential impacts to groundwater supplies in private wells would be significant without mitigation. However, the DEIR concluded that the impact would be less than significant after implementation of mitigation. The groundwater analysis and underlying data were reviewed by the County's water supply experts, who concurred that the analysis was accurate and that the impacts would be less than significant after implementation of mitigation. As such, the groundwater analysis constitutes substantial evidence to support the DEIR's conclusions.

Response to Comment Ind 736-6

The commenter states that the County should age-date the mine shaft water at several discrete depths to determine if water percolates into the mine in less than 80 years and should monitor specific wells at high resolution to generate baseline data before dewatering. Isotopic age dating of the water at various depths within the existing mine is described on page 65 of Appendix K.2 of the DEIR. The data indicate that the water at all depths sampled is less than five to 10 years old. This finding is consistent with the dynamic (i.e., not static) flow of water through the mine workings, as discussed in the Response to Comment Ind 736-2. Since the water under existing conditions takes only a few years to flow through the mine workings, and the existing water levels in the mine are below the static groundwater level in the surrounding fractured bedrock, then if there was a direct connection between the mine workings and any existing private well, it would already be reflected in the current observations.

The DEIR has concluded that additional monitoring is necessary as part of a mitigation program (Mitigation Measure 4.8-2(a)). Performance standards that identify when a well is impacted have also been identified in the DEIR (Mitigation Measure 4.8-2(b) on DEIR page 4.8-68).

The groundwater monitoring plan (Itasca 2021) provides a rationale for installing specifically designed groundwater monitoring wells versus using existing domestic wells.

The Itasca groundwater monitoring plan provides the following rationale:

> Assessment of impacts of water-level changes in domestic wells is difficult to perform when examining each domestic well on an individual basis because of operational and depth considerations for each well. In order to understand water-level fluctuations within the well, one must know how the well is completed and screened. The fluctuations of the water levels for each domestic well are controlled by the pumping rate, and it is not easy to obtain accurate pumping rates for a domestic well over time. Measuring well yields from domestic wells as an indicator of potential impacts from mining is not recommended because well yields or specific capacities of the well will not indicate impacts due to mining. Specific capacity is defined as the pumping rate (e.g., gallons per minute) divided by the drawdown, which is usually measured in feet. Specific capacities of wells can be influenced by many factors, such as mineral encrustation of the well screen, a malfunctioning pump, or biofouling of the well screen due to bacterial growth within the screen or well. These influences cannot be attributed to Rise's operations. The primary impact on a domestic well that may be attributed to the mining operations by Rise would be a decline of the water level in the well that is sufficient enough to reduce its use to provide an adequate water supply.

Nevertheless, in response to public comments, and as discussed in Master Response 15 – Adequacy of Groundwater Monitoring Wells, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master

Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Groundwater monitoring will be initiated at least 12 months before the commencement of dewatering. This will allow sufficient time to assess background conditions.

Response to Comment Ind 736-7

Monitoring of water quality from the mine, which would reveal if there were any changes due to encountering different rock types or geochemical conditions, as stated in the comment, is included as part of Mitigation Measure 4.8-1(a) on DEIR page 4.8-52. Additionally, monitoring of groundwater quality through the monitoring wells is also required by the groundwater monitoring plan.

Mitigation Measure 4.8-2(a) on page 4.8-68 of the DEIR is hereby amended to clarify that the groundwater monitoring plan includes monitoring requirements for water quality, as follows:

> *4.8-2(a)* *The Project Applicant shall implement the Groundwater Monitoring Plan (GMP) prepared by Itasca Denver, Inc. (February 2021), as approved by the County. Implementation of the GMP shall be initiated prior to the dewatering of the mine and on an ongoing basis. Pursuant to the GMP, a network of monitoring wells shall be installed to the satisfaction of the Nevada County Environmental Health Department. Prior to construction of any monitoring wells within the County or City right-of-way, the applicant shall obtain an encroachment permit from the Public Works Department of the respective agency. Groundwater-level and groundwater quality information shall be obtained from the project groundwater monitoring wells and collected on a quarterly basis, and submitted in report form to the Nevada County Environmental Health Department, and used to generate the following information:*
>
> *1) Water-level and groundwater quality monitoring data for a minimum of 12 months before commencement of dewatering of the mine.*
>
> *[…]*

The above change has been made in response to the comment for clarification purposes and does not alter the conclusions of the DEIR. It is also noted that the Domestic Well Monitoring Plan proposed by the applicant (see Master Response 15 – Adequacy of Groundwater Monitoring Wells) similarly requires evaluation of water quality data from domestic wells within the projected 1-foot drawdown contour.

Response to Comment Ind 736-8

The commenter asserts that the monitoring program should use existing wells rather than new monitoring wells. The commenter recommends "tiered" groundwater monitoring to identify problems before they become critical. Additionally, the commenter states that the radius of drawdown will not be known until dewatering occurs. Mitigation Measures 4.8-2(a), -2(b), and -2(c) address monitoring, performance standards, and corrective measures to address impacts to individual wells. While the commenter disagrees with the conclusions of the DEIR, the groundwater analysis and underlying data were reviewed by the County's water supply experts, who concurred that the analysis was adequate and that the impacts would be less than significant after implementation of mitigation. As such, the groundwater analysis constitutes substantial evidence to support the DEIR's conclusions. In addition, as previously noted, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the

predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 736-9

The commenter states that the mine will cause well owners to lose their water supply for 80 years and will handicap the community's ability to respond to future droughts. The existing baseline data evaluated in the DEIR do not provide substantial evidence that drought conditions (i.e., several successive years of below normal precipitation) have an appreciable effect on the groundwater elevation in the areas surrounding the project. With only a few exceptions, the monitored wells show consistent patterns and cycles that do not vary depending on the amount of rainfall. For the few wells that do not follow such patterns, the variations, or trends do not correlate with wet and dry periods. While drought conditions and the potential effects on groundwater supply are of concern throughout the state of California, the existing data do not indicate that drought conditions have had any substantial effect on the groundwater within the fractured bedrock in the project area. Please see Responses to Comments Ind 736-1 to Ind 736-8.

The proposed project would diversify water supplies available to the community and increase drought resiliency (see Master Response 16 - Drought and Climate Change). No groundwater level measurements have been completed since 2007 which creates some uncertainty to the predicted impact to percentage of water column in domestic wells. Uncertainty in predicted impacts is addressed through the various sensitivity scenarios discussed in Appendix K.3, the application of a 100% factor of safety (see page 4.8-58 of the DEIR), and the proposed connection of all 30 properties, including properties where no significant impact is predicted, in the E. Bennett area to NID potable water (see page 4.8-66 of the DEIR). Nevertheless, the analysis in Chapter 4.8 of DEIR has determined that the project could result in a significant impact to groundwater supplies without implementation of a groundwater monitoring program and well mitigation plan. Mitigation Measure 4.8-2(a) requires that a minimum of 12 months of water-level monitoring data is collected before commencement of dewatering. Impacts to domestic water wells will be measured against those current baseline measurements and not historic water levels. Mitigation Measure 4.8-2(b) requires well mitigation if, based the groundwater monitoring plan, a 10 percent reduction in the water column of a well is determined. Therefore, the determination of impact would be based on current water level data and any impacts to domestic wells would be mitigated through the proposed mitigation measures. In addition, as previously noted, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

The focus of proposed mining is at depth greater than 500 feet below surface, and typically greater than 1,000 feet below surface (see Figure 5-1 of Appendix K.3), which is a much greater depth than an economically feasible water supply well due to the decrease in well yield with depth in a fractured bedrock system. The decrease in fractures and hydraulic conductivity with depth is well documented. As stated on page 4.8-8 of the DEIR, the U.S. Geological Survey (Page et al., 1984) conducted a study covering a 148-square mile area of southwestern Nevada County, including the segment of the Wolf Creek watershed from Grass Valley to the Bear River. The underlying bedrock consisted of similar rock types to those encountered at the project site, including hard, dense metavolcanic and igneous rocks of pre-Tertiary age. The study results found that the degree of fracturing in the bedrock, and thus the well yield, decreases with depth, with most of the available groundwater occurring above a depth of 215 feet below the ground surface (bgs). At depths shallower than 215 feet bgs, 70 percent of the wells evaluated produced more than five

gallons per minute (gpm). However, at depths deeper than 215 feet bgs, 75 percent of the wells produced five gpm or less. As stated on page 4.8-16 of the DEIR, EMKO reviewed 38 well completion reports within a 1- to 2-mile vicinity of the project site, which contained information regarding the total drawdown that occurred and the pumping rate achieved during initial testing of the wells immediately after they were drilled. A clear correlation exists between pumping rate and depth. The maximum pumping rate achieved was 125 gpm in a well with a total depth of 123 feet bgs. In contrast, at depths of 200 feet or deeper, the maximum reported pumping rate is 50 gpm. Below a depth of 300 feet, the maximum pumping rate reported was 10 gpm, and below a depth of 450 feet, the maximum pumping rate reported was only four gpm. Similarly, Todd Engineers (2007) developed a relationship between the hydraulic conductivity and depth based on information from approximately 300 driller reports. Todd Engineers (2007) found that the hydraulic conductivity of the fractured bedrock penetrated by the domestic supply wells in their study area varied significantly with depth, with greater values at shallower depths where more fractures are prevalent, and with much lower values at deeper depths, where fractures may be either less common or have smaller aperture (open) widths.

Response to Comment Ind 736-10

The California Department of Water Resources defines alluvial groundwater basins, and by extension, subbasins. There are currently no defined groundwater basins or subbasins in the project area within Nevada County. The commenter has not provided any data or other substantial evidence to support the statements or arguments in this comment for the County to evaluate further. Thus, the concerns raised are speculative and not related to a specific action or set of actions. The existing data does not provide an indication that would lead to a conclusion in the DEIR that the project would deplete or “overdraft” the groundwater throughout the region. The commenter’s argument that the dewatering of the mine could lead to the surface owner’s loss of a legal right to groundwater beneath their property is not supported by any legal citation and is speculative.

However, the DEIR does conclude that the project could have a significant impact on individual wells and provides mitigation measures that require monitoring, define performance standards, and prescribe corrective actions to address such impacts (see Mitigation Measures 4.8-2(a), -2(b), and -2(c) on pages 4.8-67 and -68).

Individual Letter 737

Dist 1

Ind 737-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Sterling Bailey

Address 14167 Loma Rica Dr. G.V. ZIP 95945

Phone

Email Address sterling.bailey@att.net

INDIVIDUAL LETTER 737: STERLING BAILEY

Response to Comment Ind 737-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 738

Gmail

Sterling Honea <sterlinghonea@gmail.com>

EIR gold mine

Sterling Honea <sterlinghonea@gmail.com>
Draft To: Idaho.MMEIR@co.nevada.ca.us

Wed, Feb 9, 2022 at 6:29 PM

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NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 3

Mr. Matt Kelley, Senior Planner
Nevada County Planning Department.
950 Maidu Avenue.
Nevada City, California 95959.
Idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelley,

The following reflects my comments as a resident of the City of Grass Valley with respect to Draft EIR number SCH 20200 -70378, commonly referred to as the Idaho Maryland Mine project (hereafter project).

INTRODUCTION

Ind 738-1 The purpose of a draft EIR is to alert the general public and elected officials to environmental changes before they reach an ecological point of no return. In essence, it is an "alarm bell" to demonstrate to apprehensive citizenry that the lead agency has in fact analyzed and considered all ecological implications of the report. If CEQA is scrupulously followed the public will know the basis on which its responsible officials either approve or reject environmentally significant action, and the public will be duly informed and can respond accordingly to action to which it disagrees. According to the most cited California Supreme Court in this area held that: "The EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." (Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal. 3rd 376, 392, 405).

I believe the report does make an attempt to identify significant environmental effects, and some unavoidable significant environmental effects, but it has not adequately addressed a number of issues that should be identified separately in order for the project to proceed further.

DEFICIENCIES IN EIR PROJECT REPORT

Ind 738-2 The project readily admits that it will need financing for it to proceed to completion. However, there is no discussion whatsoever of how this financing will be obtained. Rise Gold Grass Valley appears to be a shell company with no significant financial assets for a project of this magnitude. The report does not indicate otherwise.

The report does not indicate the applicant has any financial backing for a project like this to proceed. There are no identified partners or other companies that will be forming any type of joint venture. Such a discussion and an analysis is extremely important in the event that the project has to be shut down for economic or other reasons like it did in 1956, and the public is not left holding the bag and put in the federal Super Fund endless line for eventual remediation.

Ind 738-3 There's no discussion in the project report as to what the minimum price of gold would have to be for the mining project to remain profitable, if it was opened again. Without such critical information and the history of the applicant operating a project on the scale of this one, this would be critical information necessary for the public to know.

Ind 738-4 There is no discussion if the applicant has ever successfully operated a project like this adjacent to a residential and commercial community such as Grass Valley. The project in section 4.7 acknowledges that this undeveloped project is next to low density, residential developments and commercial uses.

Ind 738-5 One of the most critical omissions of the project report is an analysis and discussion of insurance that would be required, and if the applicant is able to even acquire such insurance for a high risk rock mining operation.

Ind 738-6 No discussion is offered concerning necessary indemnification agreements with the County of Nevada or City of Grass Valley which is in the affected area. There is possible massive environmental disruption this project could cause, including endless class action lawsuits against the county. If the county approved the project, who would be responsible for payment of all the attorney fees, court costs, and expert witnesses to defend the county's position? If the applicant

abandoned the project for any reason, how is the county protected against necessary expenditures for all foreseeable consequences or remediation costs?

Ind 738-7

The project proposes a high risk operation which is covered by the strict liability legal standard. There is no analysis or discussion of what type of liability insurance the applicant could obtain. Accordingly, it would be difficult to even get an excess and surplus lines policy as there are few companies that would offer such a policy, such as Munich Re or Lloyd's Group. There is no discussion there is even a preliminary commitment by any adequately capitalized reinsurance company that would be willing to issue a policy that would cover the potential liability this report clearly shows is possible and foreseeable. Even if a policy could be obtained, the retention would be enormous, and as noted above, there is no financial information in the report that would indicate the applicant would qualify for the type of policy and reinsurance needed.

Ind 738-8

Another area that would require insurance would be the issue of earth movement. A standard homeowner's policy or commercial policy does not cover damage to property or structures as a result of earth movement. What happens if due to blasting operations, scheduled for twice daily, or dewatering, the buildings nearby suffer damage as a result of earth movement? Who is going to be responsible for obtaining the necessary earth movement endorsement insurance to give peace of mind to nearby residents in case there is damage? Or does the applicant propose to establish a claim bond fund for any claims that may arise whether or not it can be definitively proven if the applicant caused or partially caused earth movement that damaged nearby property?

Ind 738-9

Another example is that only a portion of the project proposes to give some nearby residents access to potable water. What type of insurance would be made available to other residents who may be adversely affected by their well operations either by contamination, volume, or quality? Does Rise Gold propose to issue policies to protect such property owners by way of a loss payee endorsement? It is common knowledge that a first party claim or lawsuit has a much greater chance of being resolved in favor of the resident who has a legitimate loss or claim, than a third-party lawsuit in which the claimant must prove actual and proximate causation for any damages for recovery.

Ind 738-10

Noticeably absent from analysis is the EIR assertion that there have only been three incidents of fatalities involved in underground mines in the past 25 years, one of which involved "CO poisoning." No discussion was made as to whether or not such mines were in close proximity to residential and commercial infrastructure such as this project. The fact that accidents do occur is even more compelling that a more comprehensive analysis of insurance must be included in a supplemental EIR report.

Ind 738-11

It is important to note that the project encompasses approximately 2,585 acres in the area. There's no indication if existing tunnels will be used or if new ones will be drilled, not to mention the discussion of explosion mitigation factors. There is no table or map that I can find that identifies the specific geographic location of the 73 miles of existing tunnels, or map of the 2,585 acres of mineral rights. (sec. 4.7) Nor is there a discussion of specific reclamation procedures and how long it would take to dewater these tunnels and the effect upon neighboring properties in terms of soil compaction and water quality.

Ind 738-12

One of the most significant deficiencies in this project report is the economic consequences to nearby businesses and residences. There is no analysis of property values possibly going down because of potential environmental effects, especially noise and traffic congestion. The only economic analysis done was that it would add 300 jobs to the tax base. An analysis and discussion needs to be done with regard to the economic consequences of property values that would counterbalance the positive contribution to the tax base. What type of buyer would want to be nearby? 118 round trips per day truck hauls by any standard, would contribute to traffic congestion, air pollution, and noise pollution that the report acknowledges is unavoidable and not capable of acceptable mitigation. Compounding an already unavoidable consequence of the project, is a lack of discussion as to how far these trucks will travel per day and what areas would be affected other than the ones nearby. No remediation of the noise was even addressed (except prohibiting trucks with Jake Brakes), such as the use of EV trucks that will become widely available in 2024.

Ind 738-13

CONCLUSION

The glaring and significant report omissions affecting the environment need to be addressed by ordering a supplemental report with public comment allowed thereafter within 45 days. If a request to intervene by the City of Grass Valley is filed, it should be permitted to participate as a necessary party due to their city residents being within the phase of influence for this project.

Respectfully submitted,

Sterling Honea

cc

Clerk for the board of supervisors

City Attorney of Grass Valley

INDIVIDUAL LETTER 738: STERLING HONEA (1)

Response to Comment Ind 738-1
The commenter states that the DEIR, as a general matter, is inadequate. Responses to specific comments are provided below.

Response to Comment Ind 738-2
The commenter states that the Project Applicant has not demonstrated adequate financing for the project. However, this matter does not fall within the scope of CEQA review. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

The project requires an approved Reclamation Plan. To ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan. (DEIR, p. 4.6-24; Appendix C.)

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other State and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 738-3
The commenter states that the DEIR omits any discussion of the price of gold needed to ensure the project is profitable. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 738-4
The commenter states that the DEIR does not discuss whether the Project Applicant has successfully implemented a similar project in the past. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 738-5
The commenter states that the DEIR omits any analysis and discussion of any insurance that would be required. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts, as well as Response to Comment Ind 738-2.

Response to Comment Ind 738-6
The commenter states that the DEIR omits any analysis and discussion of any indemnification agreements that would be required by the County. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts, as well as Response to Comment Ind 738-2.

Response to Comment Ind 738-7

The commenter states that the DEIR omits any discussion of any potentially available insurance policies for the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts, as well as Response to Comment Ind 738-2.

Response to Comment Ind 738-8

The commenter questions how the project will obtain insurance in the event that underground blasting causes damage to structures on the surface. Although the Project Applicant's insurance for the project is not a CEQA matter, all groundborne vibrations calculated for blasting of both drift round and longhole stopes, respectively, fall below the U.S. Bureau of Mines recommendations and the levels at which structural damage to buildings is possible. (DEIR, p. 4.10-54.) Mitigation Measure 4.10-4 requires a Ground Vibration Monitoring Program to ensure the impact from blasting vibrations is less than significant.

As stated on page 4.6-47 of the DEIR, near-surface mine features require closure prior to initial mine dewatering to ensure that collapse does not occur. Mitigation Measure 4.6-3(c) requires the closure of these features prior to mine dewatering. The commenter is also referred to Master Response 29 - Near Surface Workings.

Response to Comment Ind 738-9

The commenter is concerned about what insurance would be available for residents that lose access to groundwater as a result of the project. The commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 738-10

The commenter states that a supplemental EIR is required because there have been three mining-related accidents involving explosives and breaking agents in the Country in the past 25 years, and the DEIR does not state whether these accidents occurred in residential or commercial areas. As demonstrated by the DEIR, mining-related accidents involving explosives or breaking agents are extremely rare. (DEIR, p. 4.7-28.) California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst-case scenario." (see *Napa Citizens for Honest Government v. Napa County Bd. Of Supervisors* (2001) 91 Cal.App.4th 342.)

Response to Comment Ind 738-11

The commenter states that certain project details are not discussed in the DEIR. Proposed underground mining is described on pages 3-18 and 3-19 of the DEIR. The dewatering, including an estimate of time to dewater the mine, is provided on page 3-15 of the DEIR and page 30 of Appendix K.2 of the DEIR. A map showing the mineral rights area is shown on Figure 3-2 of the DEIR. Maps showing the location of existing underground tunnels are provided in Appendix K.2 and K.3 of the DEIR. Impacts from the use of explosives are analyzed in Chapters 4.10 and 4.7 of the DEIR. The Reclamation Plan is provided as Appendix C of the DEIR. Impacts from mine dewatering, including impacts to water quality, are addressed in Chapter 4.8 of the DEIR. Mine dewatering would not affect "soil compaction" of neighboring properties and it is unclear what the commenter is referring to. The commenter is referred to Chapter 4.6 of the DEIR.

Response to Comment Ind 738-12

The commenter states that the DEIR lacks any discussion of economic impacts from the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts. The commenter also references a number of impacts

that could impact economic values in the area such as traffic and emissions. Traffic impacts are analyzed in Chapter 4.12 of the DEIR. Air quality, including emissions from trucks, is analyzed in Chapter 4.3 of the DEIR. Noise from trucks is less than significant after mitigation. The commenter is referred to Chapter 4.10 of the DEIR.

Response to Comment Ind 738-13

The commenter states that the DEIR is inadequate and opposes the project. The commenter's opposition to the project is noted for the decisionmakers.

Individual Letter 739

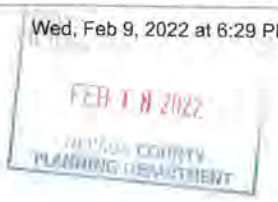
Gmail

Sterling Honea <sterlinghonea@gmail.com>

EIR gold mine

Sterling Honea <sterlinghonea@gmail.com>
Draft To: Idaho.MMEIR@co.nevada.ca.us

Wed, Feb 9, 2022 at 6:29 PM



Mr. Matt Kelley, Senior Planner
Nevada County Planning Department.
950 Maidu Avenue.
Nevada City, California 95959.
Idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelley,

The following reflects my comments as a resident of the City of Grass Valley with respect to Draft EIR number SCH 20200 -70378, commonly referred to as the Idaho Maryland Mine project (hereafter project).

INTRODUCTION

The purpose of a draft EIR is to alert the general public and elected officials to environmental changes before they reach an ecological point of no return. In essence, it is an "alarm bell" to demonstrate to apprehensive citizenry that the lead agency has in fact analyzed and considered all ecological implications of the report. If CEQA is scrupulously followed the public will know the basis on which its responsible officials either approve or reject environmentally significant action, and the public will be duly informed and can respond accordingly to action to which it disagrees. According to the most cited California Supreme Court in this area held that: "The EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." (Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal. 3rd 376, 392, 405).

I believe the report does make an attempt to identify significant environmental effects, and some unavoidable significant environmental effects, but it has not adequately addressed a number of issues that should be identified separately in order for the project to proceed further.

DEFICIENCIES IN EIR PROJECT REPORT

Ind 739-1

The project readily admits that it will need financing for it to proceed to completion. However, there is no discussion whatsoever of how this financing will be obtained. Rise Gold Grass Valley appears to be a shell company with no significant financial assets for a project of this magnitude. The report does not indicate otherwise.

The report does not indicate the applicant has any financial backing for a project like this to proceed. There are no identified partners or other companies that will be forming any type of joint venture. Such a discussion and an analysis is extremely important in the event that the project has to be shut down for economic or other reasons like it did in 1956, and the public is not left holding the bag and put in the federal Super Fund endless line for eventual remediation.

There's no discussion in the project report as to what the minimum price of gold would have to be for the mining project to remain profitable, if it was opened again. Without such critical information and the history of the applicant operating a project on the scale of this one, this would be critical information necessary for the public to know.

There is no discussion if the applicant has ever successfully operated a project like this adjacent to a residential and commercial community such as Grass Valley. The project in section 4.7 acknowledges that this undeveloped project is next to low density, residential developments and commercial uses.

One of the most critical omissions of the project report is an analysis and discussion of insurance that would be required, and if the applicant is able to even acquire such insurance for a high risk rock mining operation.

No discussion is offered concerning necessary indemnification agreements with the County of Nevada or City of Grass Valley which is in the affected area. There is possible massive environmental disruption this project could cause, including endless class action lawsuits against the county. If the county approved the project, who would be responsible for payment of all the attorney fees, court costs, and expert witnesses to defend the county's position? If the applicant

abandoned the project for any reason, how is the county protected against necessary expenditures for all foreseeable consequences or remediation costs?

The project proposes a high risk operation which is covered by the strict liability legal standard. There is no analysis or discussion of what type of liability insurance the applicant could obtain. Accordingly, it would be difficult to even get an excess and surplus lines policy as there are few companies that would offer such a policy, such as Munich Re or Lloyd's Group. There is no discussion there is even a preliminary commitment by any adequately capitalized reinsurance company that would be willing to issue a policy that would cover the potential liability this report clearly shows is possible and foreseeable. Even if a policy could be obtained, the retention would be enormous, and as noted above, there is no financial information in the report that would indicate the applicant would qualify for the type of policy and reinsurance needed.

Another area that would require insurance would be the issue of earth movement. A standard homeowner's policy or commercial policy does not cover damage to property or structures as a result of earth movement. What happens if due to blasting operations, scheduled for twice daily, or dewatering, the buildings nearby suffer damage as a result of earth movement? Who is going to be responsible for obtaining the necessary earth movement endorsement insurance to give peace of mind to nearby residents in case there is damage? Or does the applicant propose to establish a claim bond fund for any claims that may arise whether or not it can be definitively proven if the applicant caused or partially caused earth movement that damaged nearby property?

Another example is that only a portion of the project proposes to give some nearby residents access to potable water. What type of insurance would be made available to other residents who may be adversely affected by their well operations either by contamination, volume, or quality? Does Rise Gold propose to issue policies to protect such property owners by way of a loss payee endorsement? It is common knowledge that a first party claim or lawsuit has a much greater chance of being resolved in favor of the resident who has a legitimate loss or claim, than a third-party lawsuit in which the claimant must prove actual and proximate causation for any damages for recovery.

Noticeably absent from analysis is the EIR assertion that there have only been three incidents of fatalities involved in underground mines in the past 25 years, one of which involved "CO poisoning." No discussion was made as to whether or not such mines were in close proximity to residential and commercial infrastructure such as this project. The fact that accidents do occur is even more compelling that a more comprehensive analysis of insurance must be included in a supplemental EIR report.

It is important to note that the project encompasses approximately 2,585 acres in the area. There's no indication if existing tunnels will be used or if new ones will be drilled, not to mention the discussion of explosion mitigation factors. There is no table or map that I can find that identifies the specific geographic location of the 73 miles of existing tunnels, or map of the 2,585 acres of mineral rights. (sec. 4.7) Nor is there a discussion of specific reclamation procedures and how long it would take to dewater these tunnels and the effect upon neighboring properties in terms of soil compaction and water quality.

One of the most significant deficiencies in this project report is the economic consequences to nearby businesses and residences. There is no analysis of property values possibly going down because of potential environmental effects, especially noise and traffic congestion. The only economic analysis done was that it would add 300 jobs to the tax base. An analysis and discussion needs to be done with regard to the economic consequences of property values that would counterbalance the positive contribution to the tax base. What type of buyer would want to be nearby? 118 round trips per day truck hauls by any standard, would contribute to traffic congestion, air pollution, and noise pollution that the report acknowledges is unavoidable and not capable of acceptable mitigation. Compounding an already unavoidable consequence of the project, is a lack of discussion as to how far these trucks will travel per day and what areas would be affected other than the ones nearby. No remediation of the noise was even addressed (except prohibiting trucks with Jake Brakes), such as the use of EV trucks that will become widely available in 2024.

CONCLUSION

The glaring and significant report omissions affecting the environment need to be addressed by ordering a supplemental report with public comment allowed thereafter within 45 days. If a request to intervene by the City of Grass Valley is filed, it should be permitted to participate as a necessary party due to their city residents being within the phase of influence for this project.

Respectfully submitted,

Sterling Honea

cc
Clerk for the board of supervisors
City Attorney of Grass Valley

INDIVIDUAL LETTER 739: STERLING HONEA (2)

Response to Comment Ind 739-1

This letter is a duplicate copy of Individual Letter 738. Please see comments and responses in Individual Letter 738.

Individual Letter 740

From: Sterling Honea
To: Idaho MMEIR
Subject: EIR gold mine
Date: Thursday, February 10, 2022 8:54:28 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Matt Kelley, Senior Planner
Nevada County Planning Department.
950 Maidu Avenue.
Nevada City, California 95959.
Idaho.MMEIR@co.nevada.ca.us

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INTRODUCTION

The purpose of a draft EIR is to alert the general public and elected officials to environmental changes before they reach an ecological point of no return. In essence, it is an "alarm bell" to demonstrate to apprehensive citizenry that the lead agency has in fact analyzed and considered all ecological implications of the report. If CEQA is scrupulously followed the public will know the basis on which its responsible officials either approve or reject environmentally significant action, and the public will be duly informed and can respond accordingly to action to which it disagrees. According to the most cited California Supreme Court in this area held that: "The EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project."
(Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal. 3rd 376, 392, 405).

I believe the report does make an attempt to identify significant environmental effects, and some unavoidable significant environmental effects, but it has not adequately addressed a number of issues that should be identified separately in order for the project to proceed further.

Ind 740-1

DEFICIENCIES IN EIR PROJECT REPORT

The project readily admits that it will need financing for it to proceed to completion. However, there is no discussion whatsoever of how this financing will be obtained. Rise Gold Grass Valley appears to be a shell company with no significant financial assets for a project of this magnitude. The report does not indicate otherwise.

The report does not indicate the applicant has any financial backing for a project like this to proceed. There are no identified partners or other companies that will be forming any type of joint venture. Such a discussion and an analysis is extremely important in the event that the

project has to be shut down for economic or other reasons like it did in 1956, and the public is not left holding the bag and put in the federal Super Fund endless line for eventual remediation.

There's no discussion in the project report as to what the minimum price of gold would have to be for the mining project to remain profitable, if it was opened again. Without such critical information and the history of the applicant operating a project on the scale of this one, this would be critical information necessary for the public to know.

There is no discussion if the applicant has ever successfully operated a project like this adjacent to a residential and commercial community such as Grass Valley. The project in section 4.7 acknowledges that this undeveloped project is next to low density, residential developments and commercial uses.

One of the most critical omissions of the project report is an analysis and discussion of insurance that would be required, and if the applicant is able to even acquire such insurance for a high risk rock mining operation.

No discussion is offered concerning necessary indemnification agreements with the County of Nevada or City of Grass Valley which is in the affected area. There is possible massive environmental disruption this project could cause, including endless class action lawsuits against the county. If the county approved the project, who would be responsible for payment of all the attorney fees, court costs, and expert witnesses to defend the county's position? If the applicant abandoned the project for any reason, how is the county protected against necessary expenditures for all foreseeable consequences or remediation costs?

The project proposes a high risk operation which is covered by the strict liability legal standard. There is no analysis or discussion of what type of liability insurance the applicant could obtain. Accordingly, it would be difficult to even get an excess and surplus lines policy as there are few companies that would offer such a policy, such as Munich Re or Lloyd's Group. There is no discussion there is even a preliminary commitment by any adequately capitalized reinsurance company that would be willing to issue a policy that would cover the potential liability this report clearly shows is possible and foreseeable. Even if a policy could be obtained, the retention would be enormous, and as noted above, there is no financial information in the report that would indicate the applicant would qualify for the type of policy and reinsurance needed.

Another area that would require insurance would be the issue of earth movement. A standard homeowner's policy or commercial policy does not cover damage to property or structures as a result of earth movement. What happens if due to blasting operations, scheduled for twice daily, or dewatering, the buildings nearby suffer damage as a result of earth movement? Who is going to be responsible for obtaining the necessary earth movement endorsement insurance to give peace of mind to nearby residents in case there is damage? Or does the applicant propose to establish a claim bond fund for any claims that may arise whether or not it can be definitively proven if the applicant caused or partially caused earth movement that damaged nearby property?

Another example is that only a portion of the project proposes to give some nearby residents access to potable water. What type of insurance would be made available to other residents who may be adversely affected by their well operations either by contamination, volume, or

quality? Does Rise Gold propose to issue policies to protect such property owners by way of a loss payee endorsement? It is common knowledge that a first party claim or lawsuit has a much greater chance of being resolved in favor of the resident who has a legitimate loss or claim, than a third-party lawsuit in which the claimant must prove actual and proximate causation for any damages for recovery.

Noticeably absent from analysis is the EIR assertion that there have only been three incidents of fatalities involved in underground mines in the past 25 years, one of which involved "CO poisoning." No discussion was made as to whether or not such mines were in close proximity to residential and commercial infrastructure such as this project. The fact that accidents do occur is even more compelling that a more comprehensive analysis of insurance must be included in a supplemental EIR report.

It is important to note that the project encompasses approximately 2,585 acres in the area. There's no indication if existing tunnels will be used or if new ones will be drilled, not to mention the discussion of explosion mitigation factors. There is no table or map that I can find that identifies the specific geographic location of the 73 miles of existing tunnels, or map of the 2,585 acres of mineral rights. (sec. 4.7) Nor is there a discussion of specific reclamation procedures and how long it would take to dewater these tunnels and the effect upon neighboring properties in terms of soil compaction and water quality.

One of the most significant deficiencies in this project report is the economic consequences to nearby businesses and residences. There is no analysis of property values possibly going down because of potential environmental effects, especially noise and traffic congestion. The only economic analysis done was that it would add 300 jobs to the tax base. An analysis and discussion needs to be done with regard to the economic consequences of property values that would counterbalance the positive contribution to the tax base. What type of buyer would want to be nearby? 118 round trips per day truck hauls by any standard, would contribute to traffic congestion, air pollution, and noise pollution that the report acknowledges is unavoidable and not capable of acceptable mitigation. Compounding an already unavoidable consequence of the project, is a lack of discussion as to how far these trucks will travel per day and what areas would be affected other than the ones nearby. No remediation of the noise was even addressed (except prohibiting trucks with Jake Brakes), such as the use of EV trucks that will become widely available in 2024.

CONCLUSION

The glaring and significant report omissions affecting the environment need to be addressed by ordering a supplemental report with public comment allowed thereafter within 45 days. If a request to intervene by the City of Grass Valley is filed, it should be permitted to participate as a necessary party due to their city residents being within the phase of influence for this project.

Respectfully submitted,

Sterling Honea
cc
Clerk for the board of supervisors
City Attorney of Grass Valley

INDIVIDUAL LETTER 740: STERLING HONEA (3)

Response to Comment Ind 740-1

This letter is a duplicate copy of Individual Letter 738. Please see comments and responses in Individual Letter 738.

Individual Letter 741

From: Sterling Honea <sterlinghonea@gmail.com>
Sent: Wednesday, February 9, 2022 6:34 PM
To: Idaho MMEIR
Subject: EIR gold mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Matt Kelley, Senior Planner
Nevada County Planning Department.
950 Maidu Avenue.
Nevada City, California 95959.
Idaho.MMEIR@co.nevada.ca.us

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Ind 741-1

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The project proposes a high risk operation which is covered by the strict liability legal standard. There is no analysis or discussion of what type of liability insurance the applicant could obtain. Accordingly, it would be difficult to even get an excess and surplus lines policy as there are few companies that would offer such a policy, such as Munich Re or Lloyd's Group. There is no discussion there is even a preliminary commitment by any adequately capitalized reinsurance company that would be willing to issue a policy that would cover the potential liability this report clearly shows is possible and foreseeable. Even if a policy could be obtained, the retention would be enormous, and as noted above, there is no financial information in the report that would indicate the applicant would qualify for the type of policy and reinsurance needed.

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Respectfully submitted,

Sterling Honea
cc
Clerk for the board of supervisors
City Attorney of Grass Valley

INDIVIDUAL LETTER 741: STERLING HONEA (4)

Response to Comment Ind 741-1

This letter is a duplicate copy of Individual Letter 738. Please see comments and responses in Individual Letter 738.

Individual Letter 742

Steve and Carolyn Battaini
14027 Liquidambar Ln.
Grass Valley, CA 95945

April 2, 2022

Board of Supervisors
County of Nevada County
950 Maidu Ave,
Nevada City, CA. 95959

Dear Sirs,

We oppose the Idaho Maryland Mine because it's a short-sighted, profit driven project with long-term consequences for this community, for local flora and fauna, the air, the water, and our quality of life. We also know well the harmful impacts of mining.

Water is the new gold. It's the lifeblood of every living creature. This project will pump it out of our county, into the watershed with the potential of heavy metal pollution to all downstream users.

Ind 742-1

We are living in a time of climate crisis and ecological emergencies. The idea itself is absurd, let alone the consequences it will have many generations into the future.

This unconscious greed for gold requires no regard to the unforgiving impacts it leaves in the wake of the destructive operations to get it out of the ground, literally, under our homes. In a nutshell, mining devastates communities, water and the environment, and should never be considered an option where people live nearby or downstream.

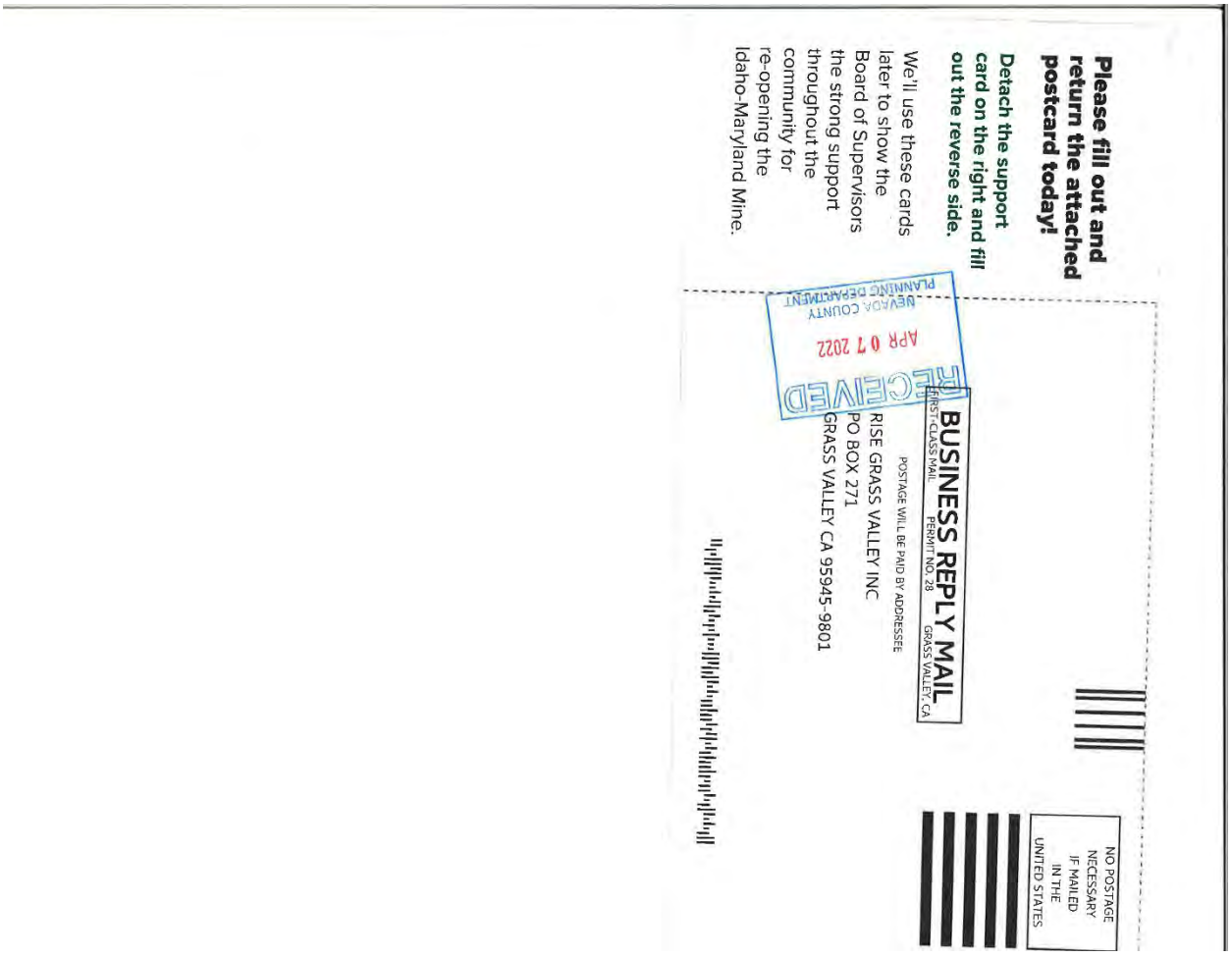
Please consider the horrible consequences of this ill advised project to the area, California, United States and the world.

Thank you for your consideration.

Sincerely,

Carolyn Battaini

Carolyn & Steve Battaini



Please fill out and return the attached postcard today!

Detach the support card on the right and fill out the reverse side.

We'll use these cards later to show the Board of Supervisors the strong support throughout the community for re-opening the Idaho-Maryland Mine.

NEVADA COUNTY
PLANNING DEPARTMENT
RECEIVED
APR 07 2022

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 28 GRASS VALLEY, CA

POSTAGE WILL BE PAID BY ADDRESSEE

RISE GRASS VALLEY INC
PO BOX 271
GRASS VALLEY CA 95945-9801

Ind 742-3

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit RiseGrassValley.com and sign up.

INDIVIDUAL LETTER 742: STEVE AND CAROLYN BATTAINI

Response to Comment Ind 742-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. Regarding impacts to flora and fauna, please refer to Chapter 4.4, Biological Resources; regarding concerns regarding air, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; regarding water concerns, please see Chapter 4.8, Hydrology and Water Quality and Master Response 15 – Adequacy of Groundwater Monitoring Wells; and regarding climate concerns, please see Master Response 16 – Drought and Climate Change. Quality of life concerns are outside the scope of CEQA, as discussed in Master Response 1.

Individual Letter 743

From: Steve Farrage <sfarrage@gmail.com>
Sent: Monday, April 4, 2022 2:36 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: DEIR comments

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To the planning committee,

As a Nevada city resident I attended the open forum two weeks ago. The level of detail that was glossed over in the report is of great concern. There seems to be highly optimistic appraisals of how limited the pollution – air, water, noise etc. - will be with the mine reopening.

Ind 743-1 Our priorities should lie with reducing pollution and moving to a carbon neutral city. Allowing the mine to reopen is detrimental, damaging and dangerous for our community.

I urge the committee to reject any proposals to redevelop the
Idaho Maryland Mine.

Yours sincerely

Steve Farrage
211 Park Ave, Nevada City

Sent from my iPhone

INDIVIDUAL LETTER 743: STEVE FARRAGE

Response to Comment Ind 743-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. For additional information on impacts related to air, water, and noise, please refer to chapters 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, 4.8, Hydrology and Water Quality, and 4.10, Noise and Vibration.

Individual Letter 744

From: steve hartshorn
To: Julie Patterson-Hunter
Subject: Re: Businesses OPPOSE Rise Golds proposal
Date: Wednesday, February 23, 2022 11:38:05 AM
Attachments: image001.png
Rise Gld BOS LTR.pdf

Dist 3

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Here you go.. Thank You

Steve Hartshorn
Recreation Realty
530-277-6630
The *"Real Estate Ranger"*
Nevada City California
steve@nevadacounty.property
www.nevadacounty.property
CABRE#01710568

From: Julie Patterson-Hunter <Julie.Patterson-Hunter@co.nevada.ca.us>
Sent: Wednesday, February 23, 2022 8:32 AM
To: steve hartshorn <steve@stevehartshorn.com>
Subject: RE: Businesses OPPOSE Rise Golds proposal

Steve – there is no attached letter.

Julie Patterson Hunter, CCB
Clerk of the Board

From: steve hartshorn <steve@stevehartshorn.com>
Sent: Tuesday, February 22, 2022 5:03 PM
To: bdofsupervisors <bdofsupervisors@co.nevada.ca.us>
Subject: Businesses OPPOSE Rise Golds proposal

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To All

Please confirm receipt and read the attached letter.

Thank You

Steve Hartshorn
Recreation Realty
530-277-6630
The *"Real Estate Ranger"*
Nevada City California
steve@nevadacounty.property
www.nevadacounty.property
CABRE#01710568

Nevada County Board of Supervisors
950 Maidu Avenue
Nevada City, CA 95959-8617
bdofsupervisors@co.nevada.ca.us

RE: Businesses OPPOSE Rise Gold's proposal to re-open the Idaho-Maryland Mine

Dear Supervisors:

The undersigned businesses respectfully request that you oppose Rise Gold's proposal to re-open the Idaho-Maryland Mine.

Ind 744-1 Mining is our past, not our future. During the past 50 years, Nevada County has worked diligently to attract people and investments that contribute to and renew its economic vitality through promising and sustainable enterprises which align with the aspirations of its residents. That is what continues to make this County an attractive place to live, to make a living, and to start new business ventures.

Ind 744-2 Reopening the mine risks a transformation from a community that is a scenic and cultural destination to an industrial town that tolerates excess noise, dust, and truck traffic. It would entail supporting a business that puts precious water resources at risk, generates significant greenhouse gases, and consumes so much energy that it would completely erase the county's plan to reduce the effects of climate change. The mine could become a deterrent for many seeking to build new business opportunities in Western Nevada County, resulting in reduced community investment and property values. We welcome the County's call for an independent economic study of the impacts of the proposed mine and expect that it will include a non-mine alternative.

Rise Gold's promises to inject money into the local economy may sound attractive, but Nevada County can do better by continuing to invest in existing industries as well as new enterprises that address current priorities in the Sierra like watershed and forest management. The Economic Policy Institute Brief cited by Rise Gold actually shows that other industries can produce far better job numbers than mining, including eight industries Nevada County already has today. An economic study commissioned by the City of Grass Valley during Emgold's attempt to reopen the Idaho-Maryland Mine in 2008 concluded that Nevada County would be better off economically if it pursued other opportunities than mining.

An industrial gold mine would not be a constructive addition to our community. The social and economic benefits are far from clear. The environmental impacts are sobering.

Ind 744-3 We urge you to protect our health, economy, and quality of life. Please deny Rise Gold's application to reopen the Idaho-Maryland Mine.

Thank you for your time and consideration.

Sincerely,

2/2/22

STEVEN HAMTSHORN
BUSINESS OWNER, REALTOR
"NEVADA COUNTY PROPERTY"

Cc: Alison Lehman, County Executive Officer, Nevada County
Grass Valley City Council members
Tim Kiser, City Manager, Grass Valley
Grass Valley Union

INDIVIDUAL LETTER 744: STEVE HARTSHORN

Response to Comment Ind 744-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. Regarding the generally noted dust concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. In addition, pursuant to Mitigation Measure 4.3-2, the project must ensure that visible dust does not cross the boundary of the property and that the project is in compliance with the approved Asbestos Dust Mitigation Plan and would be required to take whatever necessary measures to ensure compliance.

Regarding noise concerns, please see Chapter 4.10, Noise and Vibration, as well as Response to Comment Ind 733-4; regarding truck traffic concerns, please see Chapter 4.12, Transportation; regarding concerns related to energy consumption, please see Chapter 4.3 and Master Response 25 – Nevada County Energy Action Plan; regarding greenhouse gases, please see Chapter 4.3 and Master Response 27 – Greenhouse Gas Thresholds and Master Response 28 – Greenhouse Gas Credits; and regarding water resources concerns, please see Chapter 4.8 and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 744-2

The comment does not address the adequacy of the DEIR. Economic impact considerations are outside the scope of CEQA - please see Master Response 2.

Response to Comment Ind 744-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 745

OPPOSE

~~I support~~ re-opening the Idaho-Maryland Mine

Dist 1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the future and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

NO MINE!

Name(s) STEVE MENDOZA, CLAUDIA GROVES

Address 10781 BANNER VIEW DR ZIP 95945

Phone 530 264 6414

Email Address

Ind
745-1

INDIVIDUAL LETTER 745: STEVE MENDOZA

Response to Comment Ind 745-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 746

From: Steve Nicola <roughnready7@gmail.com>
Sent: Wednesday, March 23, 2022 1:52 PM
To: Idaho MMEIR
Subject: Idaho-Maryland Mine Draft EIR

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Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Dear Mr. Kelley

I wish to offer my comments and recommendations on an aspect of the Idaho-Maryland mine project not covered in the Draft EIR. While the DEIR includes Chapter 4.8, Hydrology and Water Quality, the issue of water *quantity* is not addressed either here or elsewhere in the DEIR, as far as I could determine. The subject of water quantity is apropos to the discussion of groundwater in Chapter 4.8, beginning on Page 8 (and perhaps elsewhere as well).

The DEIR fails to adequately address the potential adverse affects of *climate change* on groundwater hydrology. Numerous analyses by federal and state agencies and academic institutions have documented the well established trend of increasing drought in California and the U. S. Southwest. Numerous reports from these sources are warning that our region may be entering a period of drought the likes of which have not been experienced in 1,200 years. Of course, with drought – as we have all witnessed – comes lack of precipitation, precipitation that is necessary to recharge groundwater tables.

Ind 746-1

The DEIR cites well water level monitoring data from the periods 1995 – 2001 and 2003 – 2007 (Page 4.8-11). It states that groundwater levels in the 79 wells from which they have records exhibit " . . . seasonal fluctuations . . . between wet and dry times of the year but remain relatively consistent from year to year within each individual well," citing above normal, normal, and below normal water years during the data periods (Page 4.8-12). The DEIR concludes that "**Based on the lack of changes in the individual well hydrographs between wet and dry climatic cycles, the amount of recharge appears to be consistent from year to year and is not affected substantially by drought or wet cycles**" (Page 4.8.-12).

I submit that the limited number of years from which well water level data were obtained were not sufficient to describe the occurrence of climate "cycles." The "below normal rainfall" of 2007 actually was followed by two more drought years (2008 and 2009), and since 2009 we've experienced extended drought periods of five years (2012 – 2016) and now going on another five years (2018 – 2022). Or, to put it more starkly, with the exception of 2017, it can be considered that we are in, essentially, an 11 year "drought cycle."

I believe that the data presented in the DEIR are not adequate to conclude, as the project applicants have done, that groundwater recharge, as it may affect local wells, "is not affected *substantially* by drought" [my emphasis]. At the very

1

minimum the County should require the project applicants to update their well water "quantity" data to include the years since 2009. Further, I believe it is possible that the project sampling area may not be representative of groundwater quantity trends in the region, which may over time affect recharge in the project area. Therefore, I request that the County require the project applicants to include an examination of well water level and groundwater recharge trends over a wider area than that encompassed in the DEIR.

Thank you for your consideration of my comments and recommendations.

Sincerely,

Steve Nicola

267 Bourbon Hill Road

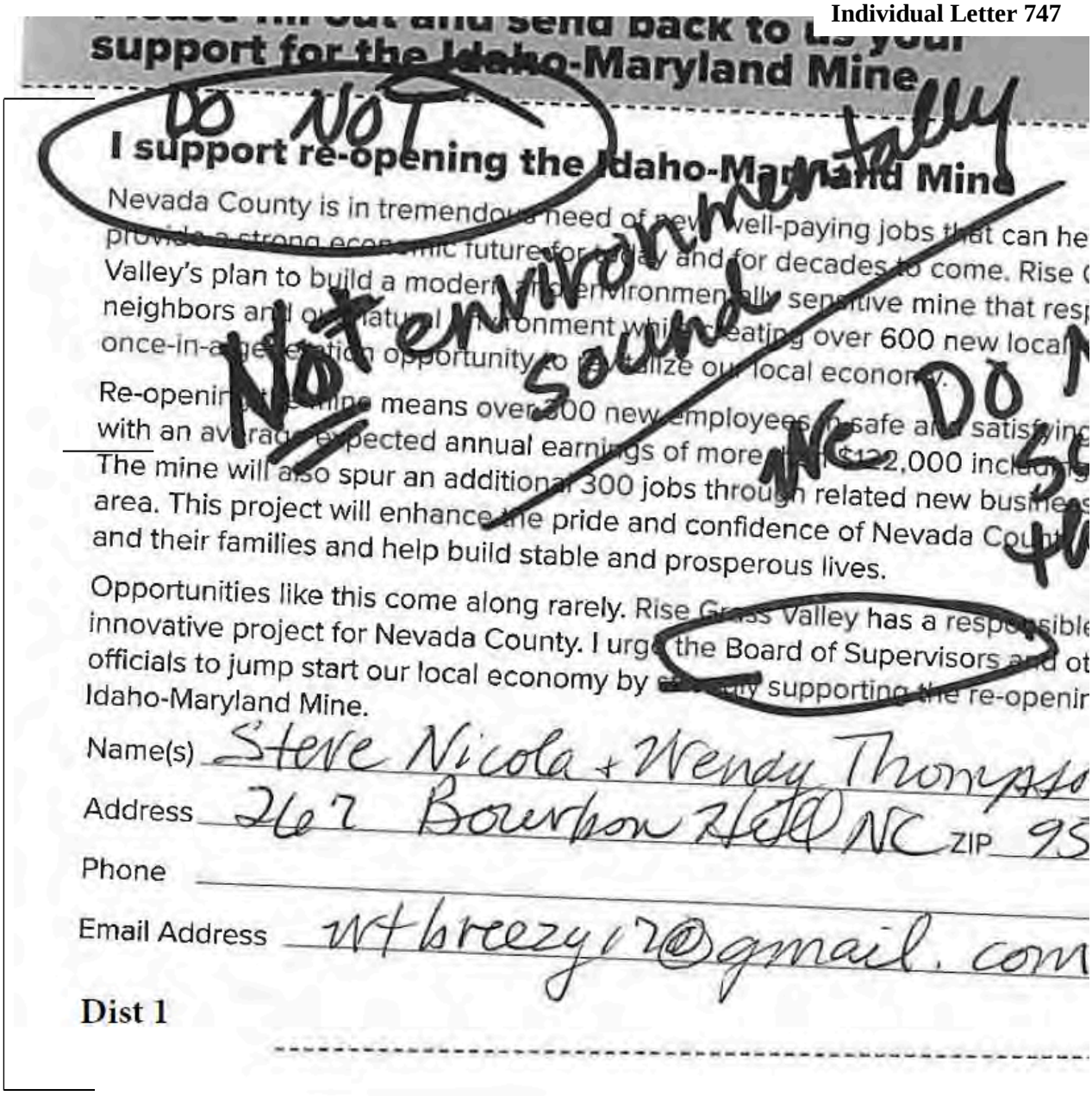
Nevada City, CA 95959

INDIVIDUAL LETTER 746: STEVE NICOLA

Response to Comment Ind 746-1

The commenter states that the DEIR fails to adequately address the potential adverse effects of climate change. The commenter specifically states that the DEIR fails to take into account groundwater levels due to the extended drought. The commenter is referred to Master Response 16 - Drought and Climate Change.

Individual Letter 747



support for the Idaho-Maryland Mine

DO NOT

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new well-paying jobs that can he
provide a strong economic future for today and for decades to come. Rise (
Valley's plan to build a modern and environmentally sensitive mine that resp
neighbors and our natural environment while creating over 600 new local
once-in-a-generation opportunity to revitalize our local economy.

Not environmentally sound

Re-opening the mine means over 300 new employees in safe and satisfying
with an average expected annual earnings of more than $122,000 including
The mine will also spur an additional 300 jobs through related new business
area. This project will enhance the pride and confidence of Nevada County
and their families and help build stable and prosperous lives.

WE DO

Opportunities like this come along rarely. Rise Grass Valley has a responsible
innovative project for Nevada County. I urge the Board of Supervisors and ot
officials to jump start our local economy by strongly supporting the re-openir
Idaho-Maryland Mine.

Name(s) Steve Nicola + Wendy Thompso

Address 262 Bourbon Hill NC ZIP 95

Phone

Email Address wtbreezy12@gmail.com

Dist 1

Ind 747-1

INDIVIDUAL LETTER 747: STEVE NICOLA AND WENDY THOMPSON

Response to Comment Ind 747-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 748

Stevee Duber
629 Spring Street
Nevada City, CA 95959

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

March 15, 2022

Re: Draft Environmental Impact Report (DEIR) on the Idaho-Maryland Mine Project

Dear Mr. Kelley,

Thank you for the opportunity to comment on the DEIR for the Idaho-Maryland Mine Project.

Ind 748-1

I am concerned that the DEIR does not use the proper baseline to analyze the impacts of the project on the environment. During the 80-year proposed permit period for the project, the Grass Valley/Nevada County region will experience increased flooding, increased wildfire, and increased temperatures, but the DEIR analyzes the projects impacts as if the project will be operating under existing conditions. The direct, indirect, and cumulative impacts of the project in a changed climate will differ from the impacts of the same project under existing conditions. For the DEIR to satisfy its obligations to inform, the DEIR must analyze the impacts of the project in the environment in which it will be operating. Specifically, but not limited to, the analysis of stormwater drainage and air quality are inadequate because the analysis is based on existing conditions rather than on the conditions which are expected during the next 80 years.

Stormwater Drainage

Ind 748-2

My main concern about the DEIR is its inadequate analysis of the stormwater drainage system. The drainage system is sized for a single, standalone 100-year/24-hour storm event. An event of smaller magnitude than what is predicted to occur. Expert scientists predict stormwater runoff during the 80-year life of the project will exceed the DEIR's 100-year/24-hour event based on climate change modeling for the Sierra Nevada. For instance, reports indicate floods comparable to the Great Flood of 1861-1862 are three times more likely to happen in the next 80 years.[1] During the 1861-1862 flood Nevada City

[1] Swain et al; Speaking about the probability of a deluge the size of the 1861-1862 storm event: "Our results suggest that such an event is more likely than not to occur at least once between 2018 and 2060, and that multiple occurrences are plausible by 2100 on a business-as-usual emissions trajectory. Therefore, recognizing that risks associated with hydroclimatic extremes may rise more rapidly than the gradual projected shift in regional mean precipitation might otherwise suggest will be a critical step in ensuring resilience amid a warming climate."

"Anthropogenic forcing is found to yield large twenty-first-century increases in the frequency of wet extremes, including a more than threefold increase in sub-seasonal events comparable to California's 'Great Flood of 1862'. Smaller but statistically robust increases in dry extremes are also apparent. As a consequence, a 25% to 100% increase in extreme dry-to-wet precipitation events is projected, despite only modest changes in mean

reported snowfall equivalent to 115 inches of rain. At Red Dog the 24-hour maximum rainfall during the 30-day storm was reported at 11 inches. [2] The "double whammy" effect of an Atmospheric River falling on accumulated snow dramatically increases surface runoff.[3]

The proposed drainage system is undersized. The maximum capacity of the proposed drainage system is calculated to contain a 100-year/24-hour storm event which will generate 9.64 inches of rain. (Preliminary Drainage Report p.7) The Preliminary Report does not consider what will happen if that 24-hour event occurs during a month-long event where flooding is exacerbated by warm rains that melt an existing snowpack as occurred during the Great Flood of 1861-1862 and which is predicted to occur again before 2060.

When the region next experiences a flood comparable to the 1861-1862 event, I am concerned that the drainage system proposed for the project will be overwhelmed and could cause a release of hazardous materials into the watershed.

I strongly encourage the County to reevaluate the proposed drainage system assuming storm conditions comparable to the Great Flood of 1861-1862 as the design storm event, not just on the basis of the maximum amount on a single day, but on the basis of a series of precipitation events that occur over a period of weeks; reevaluate how to mitigate the impacts of the project operating in an environment likely to see storm events such as the Great Flood of 1861-1862 and recirculate the DEIR.

Below are my detailed comments on the DEIR:

The DEIR does not use correct baseline conditions to analyze the impacts of storm water runoff

Ind 748-3

In section 1.3 the DEIR justifies using two environmental baselines to analyze the impacts of the proposed project. For evaluation purposes the DEIR proposes to use either existing conditions or post-remediation conditions depending on the resource topic being evaluated. For Aesthetics, Agriculture and Forestry Resource, Biological Resources, Hazards and Hazardous Materials and Wildfire, the DEIR uses an adjusted environmental baseline for the Centennial Industrial Site purported to reflect the "reasonably anticipated conditions of the site following remediation activities." For all other resource topics existing conditions are the environmental baseline.

The use of these two baselines is inadequate because they do not inform the public and decision makers about the environmental conditions *during* the 80-year life of the project. They only consider the initial conditions at the onset of the project and do not consider climate change and the expectation of

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precipitation. Such hydrological cycle intensification would seriously challenge California's existing water storage, conveyance and flood control infrastructure."

Huang et al; "The disproportionately large increases in runoff during the most extreme [Atmospheric Rivers] could raise significant challenges for water resource management and flood control. Nearly all rivers draining [Sierra Nevada] watersheds are impounded by reservoirs. During future extreme AR events, the managed or even total storage capacity of those reservoirs could be exceeded by river water volumes that would be unprecedented."

[2] Null, Jan and Hulbert, Joelle (2007, January/February). California Washed Away The Great Flood of 1862. Weatherwise, p.29.
[3] Huang et.al p.7.

more severe storm events. During this period, experts predict the quantity of runoff due to storms will increase as documented in the attached reports. In fact, the DEIR also expects stream flows and flooding to increase during this period (DEIR p. 4.3-16) but does not quantitatively address the impacts. The increase in large pulses of runoff later in the century may cause increased hazards which should be analyzed in the DEIR.

The California Natural Resources Agency advises lead agencies to consider not just existing hazards, but the potential for increasing severity of hazards over time because due to climate change, increased flooding may worsen a proposed project's direct, indirect, or cumulative environmental impacts in the future.[4] According to the decision in *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th439:

> "Consideration of future conditions in determining whether a project's impacts may be significant is consistent with CEQA's rules regarding baseline. "[N]othing in CEQA law precludes an agency... from considering both types of baseline—existing and future conditions—in its primary analysis of the project's significant adverse effects." (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal. 4th 439, 454.) "The key... is the EIR's role as an information document." (Id. at 453.)"

For the DEIR to serve its purpose as an information document, I urge the County to use a baseline that considers the storm and flood conditions that will occur during the entire 80-year permit period, update the DEIR accordingly and recirculate the DEIR.

Regarding Section 4.8-3: Substantially alter the existing drainage pattern...in a manner which would...create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Ind 748-4

In the conclusion of Section 4.8-3 the DEIR claims that peer analysis by West Yost concurs with the drainage analysis by EMKO. However, the EMKO numerical model is only based on the 100-year/24-hour storm event and does not consider the impact of the larger storm events expected with climate change. West Yost concurs the analysis is adequate based on the assumptions made for the model but recommends a reassessment of those assumptions. Significantly, but not acknowledged in the DEIR, West Yost concludes its peer review report by stating, "Rise should evaluate whether the time frame evaluated in the numerical model adequately addresses the proposed 80-year duration of permitted activities."[5]

Please require the design storm event of the DEIR be updated to reflect the environmental conditions which will exist during the 80-year duration of the project; re-analyze the impacts of the project in the relevant environment and recirculate the DEIR.

[4] California Natural Resources Agency, "Final Statement of Reasons for Regulatory Action Amendments to the State CEQA Guidelines" p.39

[5] West Yost Peer Review of Groundwater Hydrology and Water Quality Analysis and Groundwater Model Reports for the Idaho-Maryland Mine Project p.19

Regarding Mitigation Measure 4.8-3

Section 4.8-3 concludes the project's stormwater facilities design will avoid significant impacts associated with the potential to result in or contribute to runoff water exceeding storm drain system capacity. The impact, however, is nevertheless considered significant in the DEIR because The Preliminary Drainage Report does not meet the requirements for regulatory compliance to reduce the impact to less than significant. Specifically, the DEIR presents a confusing set of steps for assuring that drainage is adequate for the magnitude of storm drainage events. As a mitigation measure, the DEIR proposes generation of a Final Drainage Report which will "demonstrate that the on-site storm drain systems are sized such that site runoff (in addition to treated mine discharge for the Brunswick Industrial Site) under the post-development condition will not exceed pre-development levels in the downstream channel(s) during the design storm events."

Does this mean Rise will generate a Final Drainage Report which will simply confirm the conclusions of the Preliminary Drainage Report, or will the Final Drainage Report meet regulatory compliance requirements and independently propose the necessary parameters of the drainage system? If the Final Drainage Report is generated to simply confirm the conclusions of the Preliminary Drainage Report, I don't understand how that is a sincere effort to mitigate potential significant impacts.

Ind 748-5

The mitigation measure should ensure not only that storm flows post-development do not exceed the storm flows of pre-development levels; but also, that the project does not release pollutants into the watershed while dewatering the mine during storm events like those of the 1861-1862 Great Flood. If the Final Drainage Report proposes a drainage system with different parameters than the Preliminary Drainage Report, that system must be subject to environmental review. Allowing approval of the EIR before complete analysis is concluded deprives the public and decision makers from reviewing the potentially significant impacts of the whole project.

The mitigation measure does not set out clear performance standards as required by CEQA for what the future mitigation must achieve. Significantly, the mitigation measure proposes to use the "design storm event" as a basis for its calculations. The DEIR does not define "design storm event." Assuming it is the 100-year/24-hour event, as discussed above, it is inadequate.

Why defer this mitigation measure until after project approval? What is the design storm event? If the Final Drainage Report does not concur with the Preliminary Drainage Report what will be the result? Beyond generation of a report, it is unclear what enforceable measures mitigation measure 4.8-3 contains. A deferred report is not a sufficient mitigation measure.

I urge you to require the Final Drainage Report be prepared for environmental review as a part of the DEIR using the Great Flood of 1861-1862 as the design storm event; update the DEIR accordingly and then recirculate the DEIR.

Impacts of a Storm Event like the Great Flood of 1861-1862

Ind 748-6

Attached documents describe the large storm events California may experience during the 80-year life of the project. My main concern is how the project's proposed drainage system will perform during these events.

The stormwater drain system of the Idaho-Maryland Mine is tasked with managing and treating mine water discharge in addition to the volume of water that falls during storm events. The DEIR explains ground water must be continuously pumped out of the underground mine:

"•Ground water continually flows into the underground mine. If the water is not pumped out, the water would very quickly flood the lowest tunnels. Flooding would destroy electrical equipment that was left in place and cause increased work and material waste when the workings would be again dewatered.
• The ventilation system must be continuously on in order to provide airflow through the underground workings. Continuous operation of the ventilation system is necessary to provide a safe environment underground.
• The compressed air system for the underground mine is important for emergency situations where the ventilation system could fail or a fire occur underground and therefore must be kept operational.
• Electric locomotives need to remain functional at all times to move persons and equipment from working headings to the shafts.
• Underground lighting at certain key locations is necessary for safety.
• The hoists must be available for use to move personnel and equipment from the underground to surface. If the hoists did not function the workers would be trapped underground.
• The processing plant recirculates water and ground minerals through the processing systems. The slurry of water and ground minerals must be constantly agitated so that the solids do not settle. If the recirculation machines are turned off during operations, the sand would settle in all of the tanks and pipes which is very costly and time consuming to remediate.
• *The water treatment system must remain functional so that water can be treated and discharged." (emphasis added)* (DEIR page 4.3-103)

Given the urgency of keeping the tunnels dewatered, what size pumps does Rise propose to use? Will Rise size their pumps to manage a 100-year/24-hour event like the storm water drainage system? Or will Rise protect its investment with pumps capable of conveying the groundwater that might infiltrate the mine during the large storms predicted to occur in the next 80 years? Will the water treatment and stormwater drainage system be able to manage an 1861-1862 event? If not, will the project release pollutants into the watershed? If Rise uses pumps sized for a 100-year event which fail to dewater the mine during a larger storm event, will the water treatment system fail; will the mine become inoperable; will the project release pollutants into the watershed? If a large storm event overwhelms the drainage system, where will the water being pumped out of the mine go? What will be the impacts to downstream users and infrastructure, biological, agricultural, water quality and forestry resources? If electrical power is unavailable during a large storm event, will air quality be impacted by the use of gas pumps? The answers to these questions must be presented to the public and decision makers during environmental review.

Air Quality

Ind 748-7

The DEIR analyzes the impacts on air quality of the project as if existing conditions are constant over the next 80 years. We know this will not be the case. A recent study, "Increasing co-occurrence of

fine particulate matter and ground-level ozone extremes in the western United States" by Kalashnikov, et al, (attached) details the hazards to the environment and human health of the co-occurrence of fine particulate matter and ground-level ozone. It details the climatological and meteorological conditions which are causing increased chances of elevated concentrations of both air pollutants to occur simultaneously from July through September. The proposed project will contribute considerable amounts of these pollutants to the environment against the background described not the background assumed in the DEIR. The DEIR analysis does not consider how the project's discharges will add to the concentration of fine particles and ozone existing because of meteorological changes and wildfires that will occur in the next 80 years. The DEIR's conclusion that the project will not contribute to significant impacts or significant cumulative impacts to air quality, therefore, are suspect.

In an updated DEIR I strongly urge you to reevaluate the environmental impacts to air quality of the Idaho-Maryland Mine project taking into consideration the air quality the region will experience over the next 80 years due to the co-occurrence of high temperatures and wildfires as the baseline.

Conclusion

Ind 748-8

For the DEIR to serve its purpose to inform, I request you reevaluate the environmental impacts of the Idaho-Maryland Mine project using the conditions that will occur during the 80-year permit period as a baseline for analysis.

Thank you for your consideration,

Stevee Duber
Former Sierra County Planner and former CEO of the High Sierra Rural Alliance

Attachments:

Huang, X., Stevenson, S., & Hall, A. D. (2020). Future warming and intensification of precipitation extremes: A "double whammy" leading to increasing flood risk in California. Geophysical Research Letters, 47, e2020GL088679. https://doi.org/ 10.1029/2020GL088679

Daniel L. Swain , Baird Langenbrunner, J. David Neelin and Alex Hall (2018). Increasing precipitation volatility in twenty-first-century California. Nature Climate Change. https://doi.org/10.1038/s41558-018-0140-y

CALIFORNIA NATURAL RESOURCES AGENCY (2018). FINAL STATEMENT OF REASONS FOR REGULATORY ACTION AMENDMENTS TO THE STATE CEQA GUIDELINES OAL NOTICE FILE NO. Z-2018-0116-12.

Null, Jan and Hulbert, Joelle (2007, January/February). California Washed Away, The Great Flood of 1862. Weatherwise

Kalashnikov, Dmitri A.; Schnell, Jordan L.; Abatzoglou, John T; Swain, Daniel L.; Singh, Deepti; "Increasing co-occurrence of fine particulate matter and ground-level ozone extremes in the western United States" 5 Jan 2022 • Vol 8, Issue 1 • DOI: 10.1126/sciadv.abi938

INDIVIDUAL LETTER 748: STEVEE DUBER

Response to Comment Ind 748-1

The commenter asserts that the baseline used for the DEIR is incorrect because it does not account for climate change and changing conditions that will occur during the 80-year project operation. With regard to climate change, there is no consensus on how climate change will affect groundwater recharge and numerous other areas of concern, so analysis based on varying climate change predictions would be speculative. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As analysis of climate change scenarios, when there is no consensus on how climate change will affect the project site, would be speculation, this analysis is not required by CEQA. Further, the DEIR already analyzes varying climate conditions such as large storm events and multiple drought year scenarios, so the analysis already is responsive to the commenter's concerns. Finally, while the commenter states that use of existing conditions as the baseline is incorrect, CEQA Guidelines Section 15125 states that existing conditions "will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant."

Response to Comment Ind 748-2

The commenter asserts that the storm events analyzed by the DEIR in order to size the storm water basin and drainage infrastructure are too small, and the DEIR should instead look at the great flood of 1861-1862. As stated in Appendix K.5 of the DEIR, the drainage calculations and detention basins are specifically designed to respond to the drainage requirements of the County of Nevada. The Nevada County drainage requirements indicate that new storm drain systems and channels shall be designed to convey the 10- and 100-year, 24-hour storm events. Furthermore, the California Surface Mining and Reclamation Act (SMARA) states that erosion control methods shall be designed for the 20-year, 1-hour storm and shall control erosion and sedimentation during operations as well as after reclamation is complete (see CCR Title 14, Section 3706). The 2-, 10-, 25-, and 100-year, 24-hour storm events were analyzed in this report, which more than satisfies the Nevada County requirements. Since the 100-year, 24-hour event is greater than the SMARA required 20-year, 1-hour event, the 100-year, 24-hour results will provide a greater factor of safety in the drainage design. Analysis of larger storm events would be speculation and is not required by CEQA. (CEQA Guidelines Sec. 15384.)

The engineered fill and mine water would not be classified as hazardous waste as discussed in the DEIR (see 22 CCR section 66261.3 for the definition of hazardous waste).

Response to Comment Ind 748-3

Please see Response to Comment Ind 748-1 with regard to the commenter's assertion that the baseline should include climate change effects. Regarding the different baselines used in the DEIR, the County uses an adjusted baseline for the Centennial Site in certain resource sections, because the Centennial Site will need to be cleaned up under a separate DTSC project prior to any project activity taking place on that site. If the DTSC clean up project is not completed, the project will not affect the Centennial Site. As such, analysis of the project's impacts based on existing conditions would be misleading to the public and decision makers for certain resource sections, as the project would only impact the Centennial Site after the DTSC cleanup project is implemented. Please see Chapter 1.3 of the DEIR for a full explanation of the different baseline approaches used for the project. As stated in the DEIR, "An agency may, where appropriate,

adjust its existing conditions baseline to account for a major change in environmental conditions that is expected to occur before project implementation." (DEIR, p. 1-4.) Further, CEQA Guidelines Section 15125(a)(1) states that, "…where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."

Response to Comment Ind 748-4

The commenter cites a comment from the County's independent expert, West Yost, for the argument that the DEIR should analyze larger storm events. However, the quote from West Yost referred to by the commenter references the numerical model used for the prediction of groundwater drawdown and not the drainage analysis**.** As such, this comment from West Yost was taken out of context and does not relate to stormwater flow.

The drainage calculations and detention basins are specifically designed to respond to the drainage requirements of the County of Nevada. Please see Response to Comment Ind 748-2.

Response to Comment Ind 748-5

The Final Drainage Report will take into account the engineering details of the proposed drainage improvements which will be included in the application for grading and building permits. Therefore, the Final Drainage Report is a refinement of the Preliminary Drainage Report included in the DEIR. The approval of a Final Drainage Report is an administrative action not required to be analyzed under CEQA. The Preliminary Drainage Report is provided to allow the County to analyze the project's impacts, but a final engineered drainage report is not required to be included in an EIR under CEQA. California case law provides that engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.) The DEIR clearly defines the 100-year storm event as the requirement for Nevada County hydrology and hydraulics standards (see page 4.8-82 of the DEIR). The Final Drainage Report will meet the Nevada County hydrology and hydraulics standards, and as stated in Mitigation Measure 4.8-3, the project water discharge under post-development conditions must not exceed pre-development conditions; therefore, the mitigation measure provides clear performance standards and is not deferred mitigation.

Response to Comment Ind 748-6

The commenter speculates that a large storm could flood the mine causing the pumps to not keep up with the infiltrating water, resulting in water quality impacts and impacts to biology, agriculture, infrastructure and forestry. Likewise, the commenter asks whether there would be air quality impacts from gas pumps used to dewater the mine if there is a power outage during a storm event.

As an initial point, the commenter's claim that the mine could suddenly flood due to a storm event is not accurate, as the mine shafts are designed such that they would not be subject to flooding, and the infiltration of groundwater through bedrock into the underground mine works is an extremely slow process, not one that is impacted by heavy rainfall events. A 100-year storm would have limited effect on the underground mine because the openings to surface would be limited to the Brunswick and Service shafts, which would be graded to prevent surface run-off from entering the shafts. Further, there is no history of the mine ever being flooded by large storm events; rather, the mine only flooded when the pumps were turned off for long periods of time. As such, the commenter's statements are speculation and do not require analysis in the DEIR. (see CEQA Guidelines Section 15384.) Contrary to the commenter's statement, the storm water detention pond and associated facilities are not tasked with managing and treating mine water discharge. Mine water is placed in the water treatment pond and not in the storm water detention pond.

The pumps will be sized as necessary for dewatering and ongoing maintenance of water levels in the mine. The majority of other historic shafts connected to the mine are currently or proposed to be closed before mine watering, which limits water inflow from the surface into the underground mine workings.

The site drainage plan for the Brunswick Site routes the majority of precipitation run-off from the site to the storm water detention basin, as shown in Drawing H-4 of Appendix K.5. Section 4.5 of Appendix K.2 discusses the 6.4-acre catchment area where precipitation would inflow into the water treatment pond and confirms that the designed freeboard volume is more than adequate to retain the runoff from a 100-year storm event. An emergency overflow spillway prevents water from overflowing the water treatment pond berm and mitigates the risk of catastrophic overflow or failure of the pond walls caused by rapid erosion. The detention pond outlet structure also has an emergency overflow at the top of the open culvert to prevent the pond from overflowing (see page 12 of Appendix K.5). Any emergency spill during a storm larger than a 100-year storm would be primarily precipitation and therefore any release of pollutants (iron and manganese in mine water) would be heavily diluted and inconsequential in relation to the enormous water flows and runoff during such an event. The project includes backup power generators capable of powering the entire mine operation in the event of a power disruption. No gas pumps are proposed for the project.

Response to Comment Ind 748-7

The commenter asserts that the existing baseline conditions included in the DEIR should have considered meteorological changes and wildfires that may occur in the next 80 years. The State CEQA Guidelines Section 15125 provides the following guidance for establishing the baseline:

> An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.

The baseline is not based on potential changes to the environment (such as meteorological changes and wildfires) that may or may not occur over the life of a project. These potential changes are speculative, and the CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145). Please see Response to Comment Ind 748-1.

Response to Comment Ind 748-8

This comment summarizes the commenter's prior comments and questions. Please see Responses to Comments Ind 748-1 to Ind 748-7.

Individual Letter 749

From: Steven Millard <s.millard95945@gmail.com>
Sent: Saturday, April 2, 2022 6:04 PM
To: Idaho MMEIR
Subject: I. M. Mine Reopening issues

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Ind 749-1 Of course the water issues are at the top of the priority list, loss of well water & pollution are high on the agenda as well as air pollutants in the form of particulates like asbestos & silica dust floating in the air lodging in the lungs making people sick & die anywhere around the noisy mining operation.

Ind 749-2 I believe that the affect on traffic on Brunswick road is not properly addressed as traffic has grown on this road & moves up the hill at a good clip & they are claiming minimal impact when in fact trucks hauling mine rock will be turning on either Whispering pines with a growing business park & anticipated heavier traffic on a roadway that is already well worn & in need of replacement also there are times in winter months when Brunswick rd is impassable due to snow & ice & the chance of a runaway truck sliding out of control down Brunswick is frankly a horrifying thought.
The trucks will either be turning in front of on coming traffic at Whispering pines or Idaho Maryland which after Sutton is yet another well worn road already in need of replacement all of the way to the roundabout.
At the bottom of the Brunswick hill Idaho Maryland road is a winding narrow road running dangerously close to wolf creek before the stop at Sutton way with many semi trucks going in the opposite direction along with residential traffic commuters & hospital traffic adding to the likelihood that there will be collisions along that route.

Ind 749-3 I have recently seen a map showing the existing mine footprint & it comes within feet of my property along Burma road putting my well in jeopardy as well & along Rattlesnake road as far as highland blvd.
When I spoke with M-gold who sold the rights to Rise gold they told me that I was out of the area of where they would have to be concerned about well issues & I now know that was a lie & I don't like being lied to about matters of this magnitude so I am understandably skeptical to say the least & I am firmly in opposition to the reopening proposal!
It's just not a good fit for this retirement community.
Thank you. Steven Millard 13055 BlueJay Hill Road GrassValley ca 95945

Sent from my iPhone

INDIVIDUAL LETTER 749: STEVEN MILLARD

Response to Comment Ind 749-1

The commenter is concerned with impacts to private wells and air pollution but does not state specifically how the DEIR is inadequate. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Regarding air pollution, air emissions, including silica and asbestos, are analyzed in the DEIR and are less than significant after mitigation. The commenter is referred to Chapter 4.3 of the DEIR, Master Response 21 - Conservatism of Silica Assumptions, and Master Response 22 - Conservatism of Asbestos Assumptions. The DEIR analyzes noise impacts in Chapter 4.10.

Response to Comment Ind 749-2

The commenter states that the DEIR is inadequate regarding traffic-related impacts on Brunswick Road. Traffic impacts, including cumulative impacts, have been analyzed in Chapter 4.12 of the DEIR. As stated on page 4.12-89 of the DEIR, TJKM's peer review also notes the presence of "ICY" signs on Brunswick Road, north of the Brunswick Industrial Site, also implies difficult traffic conditions during periods of inclement weather. Loaded trucks on the downhill section of Brunswick Road, approaching the Loma Rica Drive signals during poor weather, should be addressed. As mentioned above, this portion of Brunswick Road is already regularly used by heavy-duty haul trucks. An approximate length of just over 900 feet exists from the crest of the hill on Brunswick Road to its down grade intersection with Loma Rica Drive. As is currently the case, it is incumbent upon individual truck drivers to drive with caution during periods of inclement weather.

Response to Comment Ind 749-3

The commenter is concerned about impacts to the private well on the commenter's property. The commenter is referred to Master Response 13 - Historic Hydrogeologic Assessments, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The commenter is opposed to the project and states it is not a good fit for the community. The commenter's opposition to the project is noted for decision makers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 750

RISE GRASS VALLEY
Rise Grass Valley
PO Box 271
Grass Valley CA 95945

P-3 P79 104**********ECRWSH**R010
Stuart Beach
13506 Barker Ln
Grass Valley, CA 95945-7930

PRSRT STD
U.S. Postage
PAID
TMG

Dist 3

THE IDAHO-MARYLAND MINE: A PROUD HISTORY

The Idaho-Maryland Mine was one of the most productive and best-known gold mines in the United States, producing approximately 2.4 million ounces between 1866 and 1956. The mine closed in 1956 as the fixed price of gold at $35 per oz made the mining of American gold unprofitable.

NO MINE

Rise Grass Valley will reinitiate mining and will do so with a focus on green-friendly practices and minimizing the impacts to neighbors. The project will use modern, clean, state-of-the-art mining equipment and proven techniques to produce "green gold." The result is a project that has no significant impacts to water, air quality, and the natural environment or from noise or vibrations during operations.

When in full operation, Rise Grass Valley's Idaho-Maryland Mine project will create hundreds of good-paying jobs and realize broad economic benefits for Nevada County.

Ind 750-1

Please fill out and send back to us your support for the Idaho-Maryland Mine

I support re-opening the Idaho-Maryland Mine — X OPPOSE

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Stuart Beach & Jill Shoemaker
Address 13506 Barker Lane ZIP 95945
Phone Grass Valley, CA
Email Address

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit RiseGrassValley.com/contact and sign up.

RECEIVED
MAR 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

INDIVIDUAL LETTER 750: STUART BEACH AND JILL SHOEMAKER

Response to Comment Ind 750-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 751

From: Summer Song Scanlan
To: Dan Miller; bdofsupervisors
Subject: Opposition to RISE mine
Date: Thursday, February 17, 2022 12:08:08 PM

Dist 3

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Hello,

Ind 751-1 Allowing the mine to reopen and rebuild is a terrible idea. The potential to disturb or pollute groundwater for such a large population of people is too high considering the continuing drought and unknown future impacts of climate change.

Ind 751-2 Traffic would be impacted, noise levels would be too high from constant trucks, and our roads would be torn up and filthy.

Ind 751-3 This company does not have a good record of managing the environmental impact of it's mining productions -- mining, in general, should no longer be allowed in an area that is as populated as Grass Valley due to the health and environmental impacts. It went bankrupt running a project much smaller in scope! I have no faith in their ability to manage this project in a way that is not detrimental to Nevada County.

Please do not allow this to move forward!

Summer Scanlan
379 Clark Street
Grass Valley, CA 95945

INDIVIDUAL LETTER 751: SUMMER SCANLAN (1)

Response to Comment Ind 751-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 35 – Discharge to South Fork Wolf Creek and Master Response 16 - Drought and Climate Change.

Response to Comment Ind 751-2

Haul truck noise is addressed in Impact 4.10-2 of the DEIR. Regarding damage to roads, Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road.

Regarding traffic impacts, please see Chapter 4.12, Transportation, of the DEIR.

Response to Comment Ind 751-3

Please see Master Response 3 – Operator Responsibility.

Individual Letter 752

From: Summer Song Scanlan
To: Idaho MMEIR
Subject: Comment on Maryland Mine
Date: Monday, February 7, 2022 2:14:43 PM

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Ind 752-1

Hello,

I think allowing the mine to reopen and rebuild is a terrible idea. The potential to disturb or pollute groundwater for such a large population of people is too high considering the continuing drought and unknown future impacts of climate change.

Traffic would be impacted, noise levels would be too high from constant trucks, and our roads would be torn up and filthy.

This company does not have a good record of managing the environmental impact of it's mining productions -- mining, in general, should no longer be allowed in an area that is as populated as Grass Valley due to the health and environmental impacts.

Please do not allow this to move forward!

Summer Scanlan
379 Clark Street
Grass Valley, CA 95945

INDIVIDUAL LETTER 752: SUMMER SCANLAN (2)

Response to Comment Ind 752-1

This letter is a duplicate copy of Individual Letter 751. Please see comments and responses in Individual Letter 751.

Individual Letter 753

From: SUNNIE SKILES
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Monday, March 21, 2022 1:03:12 PM

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Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Ind 753-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
SUNNIE SKILES
sskiles@proyouth.net
727 Quail Haven Rd Colfax, CA 95713 Constituent
This contact information has been verified

INDIVIDUAL LETTER 753: SUNNIE SKILES

Response to Comment Ind 753-1

The comment does not address the adequacy of the DEIR, but rather expresses general support for the proposed project. Please see Master Response 1.

Individual Letter 754

From: Susan Brandt
To: Idaho MMEIR
Subject: Public Comment regarding Idaho-Maryland Mine Project (State Clearinghouse No. 2020070378)
Date: Saturday, March 12, 2022 11:33:23 AM

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To Matt Kelley, Senior Planner,

In The Union December 24, 2020, there was a full-page Christmas letter ad by Rise Grass Valley's Ben Mossman. He assures readers his goldmine won't have any ill effect on Grass Valley. He used old time photos of miners to conjure nostalgia for the old days. He invited readers to send him a letter, providing his email. So while, I am against the plan to re-start the old Idaho Maryland Mine, since he listed his email address and invited our letters, I decided to send Mr. Mossman an email.

My letter's focus was to suggest another way to develop that property, something other than a goldmine. The alternative idea would be more beneficial to the community. What if he took all the money he would use to re-start the goldmine and think of something that would be beneficial to the community? A marketplace, a park, a clean energy park, a staging location for CalFire, so many good options.

Ind 754-1

It's now two years since I was invited to write my email to Rise Grass Valley. Since then I've received two 11x14 glossy full-color promotional pamphlets mailed to my house touting the greatness of re-opening of the Idaho-Maryland Mine. His approach now is to show clean streams of water with a man washing his face in it, a young blond woman outfitted as a smiling miner - really? While he asked for my email two years ago, apparently, he didn't want to hear from me and didn't think it might offend me to send me these promotional materials.

As a resident of Grass Valley, I feel like I've been terrorized for two years, never knowing for sure if this mining might be accepted and start wreaking havoc in our beautiful town. Since I live nearby, I would be able to hear the rock grinding and explosions, I would have to drive with the mining truck traffic, my well water may be affected with the suction of water by Rise Grass Valley, my property value will decrease. Recently I had a rock hit and crack my windshield from a truck driving by my car on 174. More trucks on 174 would be disastrous for so many reasons.

What if he took all the money he would use on drills, trucks, explosives and gasoline and instead enhance the beauty of the area with — how about a Mossman Park? It could be a beautiful tribute to the old mine but with an Earth friendly park that teaches about local flora and fauna while honoring the area's mining history, how about a farmers market, a playground? Does Ben Mossman own this property? Will he ever change his mind? How do we get out of this mess?

Ben Mossman and Rise Grass Valley do not respond to the community, I can attest to that. Their PR company schemes to deceive us into thinking the community supports this. God forbid a problem arises with the gold mine — and any sort of issue could develop from explosions alone — we can't expect this company to care as much as we do about our land, to have any motivation to correct problems. This will be in our hands, and the hands of the supervisors to correct, for 80 years, what a mess this will be.

Please stop Rise Grass Valley from gold mining here. In fact, please stop all future gold mining proposals here, what a waste of time this has been for the community to deal with this possible destruction when we could be spending time doing positive things.

Sincerely,

Susan Brandt Blachley

13784 Crawford Lane

Grass Valley, CA 95945

INDIVIDUAL LETTER 754: SUSAN BRANDT

Response to Comment Ind 754-1

Regarding the commenter's suggestion of various alternatives, it is noted that the DEIR evaluates alternatives to the proposed project in Chapter 6. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers.

Regarding operational noise concerns, please see Response to Comment Ind 733-4. Regarding well water concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Property value concerns are outside the scope of CEQA – please see Master Responses 1 and 2.

SR 174 is not a proposed truck haul route for the project. Please see Response to Comment Ind 704-4.

Regarding the generally noted explosion concerns, please see Chapter 4.7, Hazards and Hazardous Materials.

The commenter's opposition to the proposed project has been noted for the record, and forwarded to the decision-makers for their consideration.

Individual Letter 755

From: susan graf
To: Matt Kelley; Letters The Union
Subject: Ray Bryars article Feb.16
Date: Wednesday, February 16, 2022 8:21:55 AM

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Ind 755-1

Ray Bryars' article today sums up what we've all been concerned about the opening of the Idaho Maryland mine but have not investigated. I object to the mine reopening, but have the usual non-information about noise, traffic, etc. impacts. Mr Bryars has researched the histories of significant mine explosions around the world so he has real insight into one huge reason why we should deny this project.

Susan Graf
339 Clay St.
Nevada City,CA 95959
530-265-o941

INDIVIDUAL LETTER 755: SUSAN GRAF (1)

Response to Comment Ind 755-1

Please refer to Chapter 4.7, Hazards and Hazardous Materials, for additional information regarding the risks associated with the use of explosives, the impact from which was determined to be less than significant after mitigation. The commenter's opposition to the proposed project has been noted for the record, and forwarded to the decision-makers for their consideration.

Individual Letter 756

RE: Rise Gold Mine

March 15, 2020
339 Clay St.
Nevada City Ca 95959

Planning:

Ind 756-1

Rise Gold is supposedly doing everything right in the reopening of the Idaho Maryland mine.

They've checked all the boxes but that doesn't mean that their property is the best use of the land. Yes, they own it and it is zoned properly, but let's assume they've thought of another use for the mine site: perhaps a nuclear reactor or a military storage facility with bombs and artillery. Nuclear waste would certainly be a good place for a defunct mine. Rise Gold could still do all the mitigation and provide jobs, but where is the use permit? That's what an EIR is supposed to cover.

Please say no to this project.

Sincerely

Susan Graf

Susan Graf
Nevada City

RECEIVED
MAR 17 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Ms. Susan F. Graf
339 Clay St.
Nevada City, CA 95959

INDIVIDUAL LETTER 756: SUSAN GRAF (2)

Response to Comment Ind 756-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. The commenter's opposition to the proposed project has been noted for the record, and forwarded to the decision-makers for their consideration.

Individual Letter 757

From: Susan Jaffe
To: Idaho.MMEIR@co.nevada.ca.us
Subject: comments about proposed mine
Date: Sunday, April 3, 2022 3:14:32 PM

Ind 757-1

I live less then a mile from the proposed Idaho Maryland mine. My husband and I and all our neighbors are totally against the opening of this mine. With all we have been throught these last 2 years, covid, threat of fires and smoke, adding mine worries is unthinkable. There is the issue of noise, traffic near our home will be constant. Air pollution, dust and truck hauling unacceptable with issues of climate change that threaten our area, as well as pollution coming up the hill from Sacramento. Possibility of losing our wells is devastating. Reduction of property values, which we are told is already happening because of threat. The area proposed is residential and totallly inappropriate for a mine and will affect wildlife and peace and tranquillity. I could go on and on. We hope the council listens and hears what so many of us feel so passionate about. No mine please. Not now or ever. Thank you for your attention. Susan Jaffe and George Marks, 13974 Glenn Pines Rd, Grass Valley, Ca 95945

INDIVIDUAL LETTER 757: SUSAN JAFFE

Response to Comment Ind 757-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition and concerns related to the proposed project. Please see Master Response 1. Regarding noise concerns, please see Chapter 4.10, Noise and Vibration, as well as Response to Comment Ind 733-4; regarding traffic concerns, please see Chapter 4.12, Transportation, which determined that all project-related traffic impacts could be fully mitigated except impacts at SR 174/ Brunswick Road (level of service impact) and Brunswick Road/Sutton Way (queuing impact in cumulative scenario); regarding the generally noted dust concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. In addition, pursuant to Mitigation Measure 4.3-2, the project must ensure that visible dust does not cross the boundary of the property and that the project is in compliance with the approved Asbestos Dust Mitigation Plan and would be required to take whatever necessary measures to ensure compliance.

Regarding climate change, please see Master Response 16 – Drought and Climate Change.

Regarding well impact concerns, please see Chapter 4.8 and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Property value concerns are outside the scope of CEQA – please see Master Responses 1 and 2.

Individual Letter 758

From: Susan Buzzini <suebuzzini@gmail.com>
Sent: Monday, April 4, 2022 4:25 PM
To: Idaho MMEIR
Subject: environmental impact report-Rise Gold

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Ind 758-1

My name is Susan Kemp, and I own a home at 122 Stanford Ct. Grass Valley, CA 95945.

First off, I want to thank you for giving our community many opportunities for input regarding such an important issue as Rise Gold. My major concerns and worries about the environmental report are as follows. First, is the noise I believe will be associated with a mining operation. Due to the increased freeway noise in the Cypress Hills area, I am disheartened by the possibility that the constant roar of mining trucks will exacerbate an already existing and growing noise problem. In addition, what about wear and tear upon our roads? Second, our water is a resource more valuable than gold, when one considers an enduring drought that has plagued our community as well as the entire West Coast. Pumping vast amounts of water into our creeks must certainly affect our aquifers. It's not enough for Rise Gold to tell the most affected that their problems will be mitigated. How will such a huge drainage of a much needed resource affect a much larger area? Third, what about the air quality? We already get enough smog and pollutants from the valley. It worries me to think that even the tiniest amount of asbestos, for instance, could linger in the air and affect our community's health. And this mining operation is to last 80 years? Fourth, I believe the aesthetics of the area will be hampered immeasurably. I don't want to live where I see swaths of trees cut down to make way for enormous piles of tailings. I don't want to see glaring mine lights that hide the stars. I want to see clear streams, catch glimpses of wildlife- - yes, even the willow flycatcher. I want to breathe in clean air and experience quiet. So do many, many others. Let's not trade the "gold" we have now for a mining operation that is fraught with so many environmental negatives. Thank you.

1

INDIVIDUAL LETTER 758: SUSAN KEMP

Response to Comment Ind 758-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the Project Driveway and Brunswick Road. (DEIR, p. 4.12-91.)

Regarding water and drought concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change.

Regarding discharge of treated groundwater, please see Master Response 35 – Discharge to South Fork Wolf Creek.

Regarding asbestos concerns, please see Response to Comment Ind 686-2.

Regarding aesthetics concerns, the DEIR already concludes that the project would substantially degrade the existing visual character or quality of public views of the project sites or the site surroundings (page 4.1-22). Implementation of Mitigation Measure 4.1-2 would reduce the significant impact by requiring more dense plantings along the project frontages to screen project structures to the maximum extent feasible. However, given the proposed heights of the structures and the permanent alteration of the views, the impact would remain significant and unavoidable. In addition, as stated on page 4.1-29, long-term changes in visual character associated with the project in combination with cumulative development, is cumulatively considerable and significant and unavoidable.

The commenter's opposition to the proposed project has been noted for the record, and forwarded to the decision-makers for their consideration.

Individual Letter 759

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Susan Merrill

Address: 115 Union Jack #47, GV, 95945

Organization (if applicable): UUCM Social Justice Task Force

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

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

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Ind 759-1

Almost 50 items that say will have significant impact. ~~Then~~ Rise says it will submit the mitigation reports at "a later date." These should not be in the DEIR.

INDIVIDUAL LETTER 759: SUSAN MERRILL

Response to Comment Ind 759-1

All project-related impacts could be reduced to a less than significant level through implementation of mitigation with a few noted exceptions. As noted in Chapter 5 of the DEIR, the proposed project would result in significant and unavoidable impacts related to aesthetics (substantial degradation of the existing visual character or quality of the site and its surroundings), and transportation (intersections of SR 174/Brunswick Road and Brunswick Road/Sutton Way). The DEIR provides substantial evidence that all other impacts would either be less than significant or less than significant with implementation of the mitigation measures incorporated into the DEIR. These mitigation measures will be made enforceable by state law through adoption of the mitigation monitoring and reporting program, included as Chapter 4 of this Final EIR.

The commenter's reference to an applicant statement that mitigation reports will be submitted at a later date is unclear. The comment has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 760

absolutely do NOT

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

EIR "solutions/mitigations" are completely inadequate

Name(s) Susan B. Reynolds

Address PO Box 2576 Nevada City CA ZIP 95959
523 Silva Ave, NC 95959

Phone (530) 265-0216

Email Address susanbr@sierra email.com

Ind 760-1

INDIVIDUAL LETTER 760: SUSAN REYNOLDS

Response to Comment Ind 760-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. The commenter's opposition to the proposed project has been noted for the record, and forwarded to the decision-makers for their consideration.

Individual Letter 761

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Av. Ste. 170
Nevada City CA 95959

Susan Turney
Edward Sherman
15385 Nancy Wy
Grass Valley CA 95949

We are not in favor of re-opening the Idaho-Maryland Mine for the following reasons:

Rise Gold issued a press release on 2/8/22, available to read on NASDAQ. com based upon the result of their recent postcard survey sent to "selected" Nevada County residents, " showing strong support" for re-opening the mine. The press release is full of forward-looking statements such as" expect, plan, project, believe." The results of re-opening the mine may materially differ from these statements, and Rise Gold is under no obligation to update these anticipatory statements.

Ind 761-1 It appears Rise Gold is attempting to attract investors to buy stock in their golden jackpot fantasy during the current inflationary period. Gold trading and gold futures, being market driven, offer no long term stability to the projected 80 year operation of the mine. The mine operation is, in fact, the extraction of non-renewable resources, using vast quantities of non-renewable resources, and then shipping the extracted resources out of Nevada County. This produces nothing of inherent value for Nevada County residents at a significant, unavoidable cost to local residents.

The EIR presents hypothetical impacts based upon best-case scenarios in current environmental conditions, without regard to drought, or other climate change factors.

Ind 761-2 For example, the projected use of 11 million gallons of water to be supplied by NID, solely for " dust control" during the preparation phase. This is more water than the population of Grass Valley would use, based upon average household water use, for one year.

Has NID factored this projected demand into their current planning?

Ind 761-3 When operational, the projected electrical demand of the mine would be 500,000 Mwh per year. This translates to using the same amount of electricity required to power 50,000 households for one year. Again , the mine would consume more resources than the city of Grass Valley.

Nevada County has unmet goals for its Ozone Management Plan. Re-opening the mine will

Ind 761-4 further degrade local air quality by increasing greenhouse gas emissions.

For example, from the projected " 100 round-trips from 6 a.m. to 10 p.m. every day" hauling waste rock by diesel powered trucks. Add impacts to air quality from blasting, rock crushing and pumping to further degradation.

Ind 761-5 The categories in the EIR that list significant unavoidable negative impacts, even with mitigation, are: noise, traffic, road damage, and the visual character of the area.

The best-case scenarios list probable decibel levels for all above-ground mining activities as just under the threshold where sleep is interrupted.

Ind 761-6 In addition to altering the visual character of the area, there will be negative impacts to sensitive species of plants, Sierra frogs and bird life on the site.

Ind 761-7 In view of the many negative impacts to Grass Valley and Nevada County, should the mine be

re-opened, the positive impacts are defined as: 162 new job positions for " trainees" at undefined wages. There is a projected need for approximately 50 qualified equipment operators at undefined wages. The balance of employees will be recruited from outside of Nevada County; those with expertise in the technical aspects of gold mining operations, at undisclosed wages. The report concludes, "there will be no significant inducement to local growth." The mine will not produce a job bonanza for local residents.

There are already 212 unfilled job openings in Nevada County.

The negative impacts and the no-impact conclusions in the EIR far outweigh the projected positive economic impacts for residents of Nevada County.

Ind 761-8

Sincerely,

Susan Turney

Edward Sherman

INDIVIDUAL LETTER 761: SUSAN TURNEY

Response to Comment Ind 761-1
The commenter states that the project will not improve the surrounding community. The commenter's opposition of the project is noted for decisionmakers. See Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 761-2
The commenter states that the DEIR does not adequately analyze the amount of water to be used by the project during the drought and questions if NID has factored in this water usage. The commenter is referred to Master Response 16 - Drought and Climate Change, Chapter 4.11, and Appendix N of the DEIR.

Response to Comment Ind 761-3
The commenter states that the project would use 500,000 MWh per year. However, as stated on page 4.3-88 of the DEIR, the project is anticipated to result in increased electricity consumption of 16,513 MWh during the year of construction and 49,613 MWh annually during operations.

Response to Comment Ind 761-4
The commenter states that the project's GHG-related emissions will impede the County's ozone management plan. Ozone is not related to GHG emissions. As stated on page 4.3-2 of the DEIR, ozone is a reactive gas consisting of three oxygen atoms. In the troposphere, ozone is a product of the photochemical process involving the sun's energy, and is a secondary pollutant formed as a result of a complex chemical reaction between reactive organic gases (ROG) and oxides of nitrogen (NO_X) emissions in the presence of sunlight. As such, unlike other pollutants, ozone is not released directly into the atmosphere from any sources.

As stated on page 4.3-91 of the DEIR, global climate change is, by nature, a cumulative impact. Emissions of GHG contribute incrementally to adverse environmental effects associated with global climate change (e.g., sea level rise, impacts to water supply and water quality, public health impacts, impacts to ecosystems, impacts to agriculture, and other environmental impacts). Because climate change is a global phenomenon, a single project could not generate enough GHG emissions to contribute noticeably to climate change.

Air emissions from all project activities have been analyzed in the DEIR. The commenter is referred to Chapter 4.3 of the DEIR.

Response to Comment Ind 761-5
The commenter states that the DEIR discusses impacts that are significant and unavoidable. The commenter also states that noise-related impacts will occur just below the threshold for sleep interruption. Significant and unavoidable impacts are presented in Section 5.6 of the DEIR.

Project noise is not just under the threshold where sleep is interrupted. The commenter is referred to Response to Comment Grp 21-130.

Response to Comment Ind 761-6
The commenter states that the project will result in biological impacts. Impacts to plants, frogs, and birds are less than significant after mitigation. The commenter is referred to Chapter 4.4 of the DEIR, Master Response 31 - Rare Plants, Master Response 37 - Birds and Raptors, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Ind 761-7

The comment states that the DEIR overstates the employment benefits of the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 761-8

The commenter states that the employment benefits of the project are outweighed by the environmental impacts. The commenter's opposition of the project is noted for decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 762

From: sgwilson
To: Idaho MMEIR
Subject: Stop the mine
Date: Wednesday, March 30, 2022 3:20:24 PM

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Ind 762-1

Just a few words to let you know I do not want you all to okay the mine project. All that I have read and all the conservations I have had lead me to believe that opening the mine is one of the WORST ideas that you all have considered. With the mine Nevada County will not gain anything rather it will lose the peace, the clear air, and the quiet that we all love. Not to mention people who will chose to leave because of the mine. Pleasefollow the will of the people and the idea it will being money to the county. Susan Wilson a citizen of Nevada County for over 40 years.

INDIVIDUAL LETTER 762: SUSAN WILSON

Response to Comment Ind 762-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The commenter's opposition to the proposed project has been noted for the record, and forwarded to the decision-makers for their consideration.

Individual Letter 763

From: Susanna Wilson <osus@pacbell.net>
Sent: Wednesday, March 30, 2022 12:24 PM
To: Idaho MMEIR
Subject: The Mine Re-Opening

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Ind 763-1

Recently a "test" was done at the proposed mine site. I live near Scotia Pines, on Carpenter Street, in a historic Victorian. My house shook, tea cups rattled and the animals (a dog and a cat) jumped and hid.

Although my home is old, and has new foundations built to current codes, I dearly love my home. I cannot believe I would have to live with this shaking and booming noise if this mine reopens!

I was born and grew up in Grass Valley during the time of the stamp mills. We still deal with the toxics left by those days. Enough I say!

Susanna Wilson

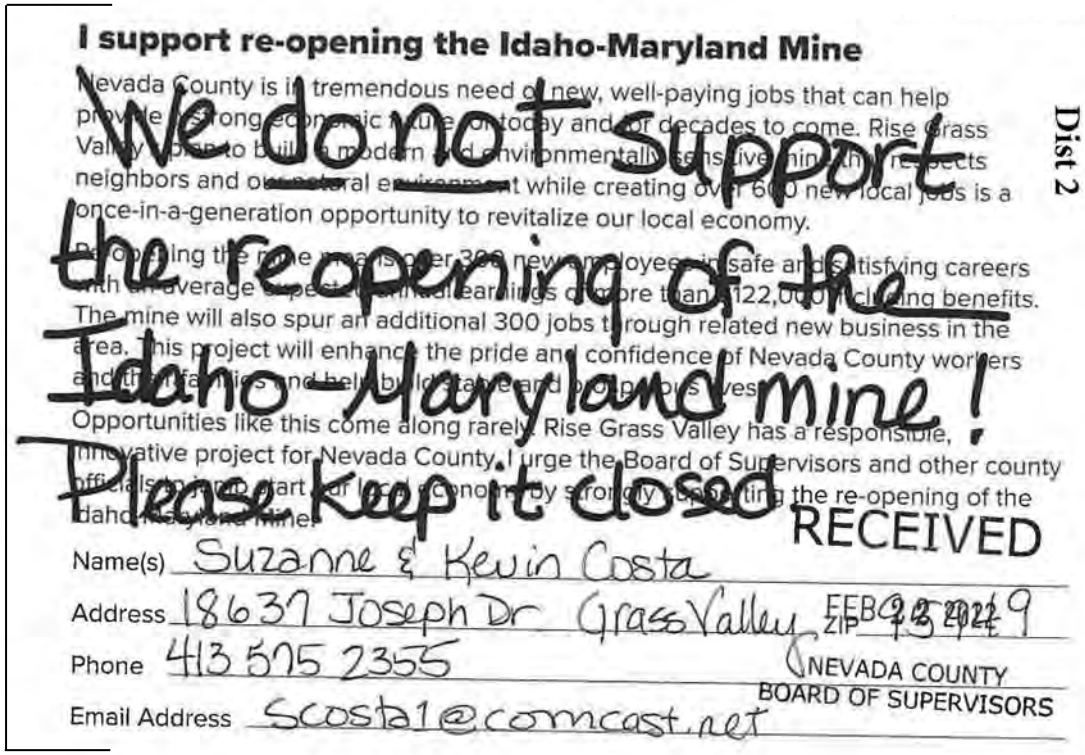
INDIVIDUAL LETTER 763: SUSANNA WILSON

Response to Comment Ind 763-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concern regarding alleged on-site testing which is not part of the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decision-makers for their consideration. For concerns related to noise and vibration, please refer to Chapter 4.10, Noise and Vibration.

Individual Letter 764

Ind
764-1



I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley plans to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Developing the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous futures.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to play a part of local economy by strongly supporting the re-opening of the Idaho-Maryland Mine!

We do not support the reopening of the Idaho-Maryland mine! Please keep it closed

Dist 2

RECEIVED
FEB 23 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) Suzanne & Kevin Costa

Address 18637 Joseph Dr Grass Valley ZIP 95949

Phone 413 575 2355

Email Address scosta1@comcast.net

INDIVIDUAL LETTER 764: SUZANNE AND KEVIN COSTA

Response to Comment Ind 764-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 765

RECEIVED
MAR 31 2022
County of Nevada
County Dev Attorney
CEQA Fiscal

Date: 3/30/22

To: Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us
(530) 265-1423

From: Suzanne and Rob Ferroggiaro
13340 Lower Colfax Rd.
Grass Valley, CA 95945
suzanneferro17@gmail.com
530-477-5344

Re: Comments on Idaho-Maryland Mine Project Draft EIR

Dear Mr. Kelley and Planning Department,

Thank you for your work on this complex issue.

We are writing as:

~ 14 yr. residents of Nevada County;

~ long-term supporters/volunteers of Wolf Creek Community Alliance, (former WCCA volunteer Restoration Coordinator);

Ind 765-1

~ long-term supporters/volunteers of South Yuba River Citizens League, (former SYRCL volunteer Clean-Up Site Coordinator);

~ long-term supporters/volunteers of Redbud Chapter of California Native Plant Society, CNPS;

~ past Chair of the Maidu Interpretive Center Foundation, Roseville, CA; and

~ as a resident with asthma.

After reading the Draft EIR, we strongly urge the Nevada County Planning Department to reject the Idaho-Maryland Mine Project (IMMP) for the multiple reasons listed below as comments on the Draft EIR, and for these overarching general comments below.

Four General reasons for denying Idaho-Maryland Mine Project:

Ind 765-2

1. After over 170 years, Nevada County is still cleaning up, mitigating for, and living with the environmental disasters from previous mining operations. Regardless of the best plans and best

practices for mining projects, unforeseen problems create environmental disasters for future generations.

2. Rather than waiting to receive proposals to resurrect similar previous disastrous mining projects, we strongly urge the NC Planning Dept. to actively seek out forward-looking projects that would be beneficial to our community such as solar power manufacturing/generation or biofuels processing/generation, etc.

Ind 765-3

3. Regardless of written plans and intentions, the Draft EIR begs the questions: How much will these plans insure that workers try to avoid damage in the moment during work? How much damage will they actually avoid in the moment during work? And how much success will there be with mitigation for damage done?

Ind 765-4

4. Lastly, we respectfully suggest that in Table 2-1, "Level of Significance" related to mitigation, there should be a category of "SA, Significant AND Avoidable", by rejecting the project.

Specific Comments on Draft EIR for rejection of Idaho-Maryland Mine Project:

Ind 765-5

Pg. 53-54 2.2 Summary Description of Proposed Project, Management Plans:

We object that all 5 sub points require County approval for the IMMP to disregard/ignore well thought out and reasonable requirements of 100' setbacks, steep slopes, and grading to keep Wolf Creek safe and sound.

Pg. 55 2.4 Summary of Project Alternatives, Alternative 1: No Project (No Build) Alternative:

Ind 765-6

It is incumbent upon the NC Planning Dept. to evaluate other site project options to create a sustainable, environmentally sound, and community appropriate project. The EIR requires the NC Planning Dept. to identify environmentally superior alternatives "...from among the range of reasonable alternatives that are evaluated." This Draft EIR's major flaw is that it does not evaluate any other reasonable alternatives to the IMMP, such as solar manufacturing/generation, or biofuel processing/generation, etc.

Ind 7656-7

Pg. 58-59 2.5 Areas of Known Controversy

All 23 items on this list are supporting reasons for rejecting the Idaho-Maryland Mine Project.

Pg. 60-158 Table 2-1 Summary Impacts and Mitigation Measures

Ind 765-8

4.1-2, Items #5-8

Existing native vegetation cannot be "repaired or replaced" adequately due to variety of plants, size of plantings, timing of planting, and irrigation needs. Level of Significance After Mitigation should be "SA, Significant and Avoidable".

Ind 765-9

4.3, 1-7

Totally inadequate mitigations. Air Quality, Greenhouse Gasses, and Energy usage should be monitored and reported daily; how will these be enforced? "...efforts to comply" equals non-

compliance. ..."sensitive receptors" means people! "... visible dust": what about invisible particles, which are most likely more damaging?

4.3-4-9

Ind 765-10 In this era of climate crisis, this cannot be "LS, Less Than Significant", or "LCC, Less Than Cumulatively Considerable"; LS and LCC designations basically say that IMMP does not need to comply with requirements which have been created for the health of all. Mitigation Measures refer only to construction, but neglect operation after construction. Even with carbon offsets verified, there will be more GHG locally.

4.4-1(a)

Ind 765-11 In all sections of Mitigation Measures for vegetation, California Native Plant Society, Redbud Chapter should be included in monitoring. It is a valuable local resource with abundant local knowledge of local native plants.

4.4-1(b)

Ind 765-12 IMMP should not be in protected Riparian Zone in the first place. Mitigation Measures should include not only bulbs, but root balls. 80% down to 50% survival is not successful.

4.4-2 (a-g)

Ind 765-13 All of these animals are the reasons for not approving a variance to the 100' setback from the Riparian Zone.

4.4-3

Inability to truly mitigate loss of riparian habitat is one more reason for not approving a variance to the 100' setback.

4.4-3(b) Implement Post-Construction Erosion Control

Ind 765-14 "...erosion control mixture" should be all native plants.

4.4-3(c)

Ind 765-15 ... "Section 404 permit... for fill" is an egregious mitigation. Wetlands cannot be successfully mitigated, restored, or created and paying an "in lieu fee" or buying credits does not protect local wetlands on site, which are part of the approximately 2% of wetlands left in California.

4.4-3(d)

Ind 765-16 ..."initiating ground disturbing activities within the non-disturbance buffers"... is an oxymoron; no Section 1600 Streambed Alteration Agreement should be approved based on this contradiction.

4.4-4

Ind 765-17 IMMP does substantially interfere with movement of native wildlife species by virtue of its existence.

Ind 765-18	4.4-6 Level of Significance After Mitigation should be "CC, Cumulatively Considerable".
Ind 765-19	4.5-2 Mitigation Measures: Both a qualified archeologist trained in local culture and also a representative of our local Nevada City Nisenan Rancheria should be on site during construction and mining activities, (not just after a bulldozer operator or mining worker, who are not trained to recognize archeological artifacts, uncovers artifacts, which may or may not cause a work stoppage); add consultation with the California Native American Heritage Commission.
Ind 765-20	4.6-2 Mitigation Measures: ..."substantial erosion"... should be "S, Significant" and "CC, Cumulatively Considerable", since even with Mitigation Measures, IMMP will be affecting Wolf Creek negatively.
Ind 765-21	4.7-1 and 2 Even with Mitigation Measures and despite Best Management Practices, there are still significant dangers of hazardous materials to the public; designation should be "SA, Significant and Avoidable".
Ind 765-22	4.7-4 and 5 Yes IMMP would impact emergency response and emergency evacuation plans due to excessive truck use of roadways; should be designated "S, Significant" and "CC, Cumulatively Considerable".
Ind 765-23	4.8-1 Designation should be "SA, Significant and Avoidable" or at a minimum, "S, Significant" and "CC, Cumulatively Considerable" because of ..."potential constituents of concern, including ammonia, arsenic, hexavalent chromium, iron manganese, pH, total suspended solids, TDS, and cis-1, 2-DCE". Monitoring reports (and NOI) should be daily or weekly, not quarterly, and should go to Nevada County, Wolf Creek Community Alliance (WCCA), and South Yuba River Citizens League (SYRCL) in addition to RWQCB.
Ind 765-24	4.8-5 "Grading and land disturbance within the limits of the SFHA (100-year floodplain) of Wolf Creek shall be avoided." "Areas within 100 feet of the 100-year floodplain, which are disturbed due to construction activity..." These statements are contradictory, and the second one shows a disregard for the importance of the 100' setback regulations.
Ind 765-25	4.8-7 These impacts are very "S, Significant" and "CC Cumulatively Considerable" to Wolf Creek, not "LS" as stated.

Ind 765-26	4.10-2, 2 (a) and 3, 2 (bi and bii) Designation should be "S, Significant" and "CC, Cumulatively Considerable". Noise monitoring evaluation should be weekly for the duration of the IMMP; 30 days is too long between monitoring evaluations when listening to loud noises. Receptor locations should be at a minimum of 5 locations, not 3-5 as stated in that section; and should be at specifically pinpointed locations, not in "surrounding" area as stated.
Ind 765-27	4.11-7 Designation should be "S, Significant" and "CC, Cumulatively Considerable" since sufficient water supplies cannot be guaranteed in the severe, extreme drought we are experiencing.
Ind 765-28	4.12-1 (b) ..."the fair share percentage is 14.9%." for Traffic Mitigation Agreement. This is not a fair share for work strictly necessitated because of the IMMP.
Ind 765-29	4.12-5 Designation should be "S, Significant"; "CC, Cumulatively Considerable"; or "SA, Significant and Avoidable".
Ind 765-30	4.12-6 (a) dot #13 Add requirements to continuously monitor wild fires within 10 mi. proximity and immediately stop all truck work on roadways to allow for public emergency evacuation on public roadways.
Ind 765-31	4.12-10 "the fair share is 8.5 percent." Again, this is not a fair share for work strictly necessitated because of the IMMP.
Ind 765-32	4.13-1 Designation should be "S, Significant", and "CC, Cumulatively Considerable" or "SA, Significant and Avoidable" because the increased truck traffic substantially impairs emergency evacuation.
Ind 765-33	4.13-2 (last dot) ..."in accordance with the State Board of Forestry and Fire Protection's, "General Guidelines for Creating Defensible Space, February 8, 2006". These guidelines are 16 yrs. out of date; use current Nevada County guidelines for defensible space.

Again, thank you for your work on this complex issue.

Sincerely,

Suzanne Ferroggiaro

Rob Ferroggiaro

INDIVIDUAL LETTER 765: SUZANNE AND ROB FERROGGIARO

Response to Comment Ind 765-1
This is an introductory comment. Please see Master Response 1 - Non-EIR/Administrative Issues. Comment noted.

Response to Comment Ind 765-2
The commenter's opposition to the project is noted for the decisionmakers. Please see Master Response 1, Non-EIR/Administrative Issues.

Response to Comment Ind 765-3
The commenter speculates as to whether, and to what extent, workers will try to avoid damage while doing work. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." This comment is speculative and does not require a specific response. Nevertheless, it is noted that a mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 765-4
The comment is unclear. Table 2-1 already has an "SU" category for significant and unavoidable.

Response to Comment Ind 765-5
DEIR Section 2.2 is a list of all entitlements and approvals sought by the applicant and required in order to construct and operate the project as proposed. The commenter's concerns have been forwarded to the decisionmakers. Please see Master Response 1.

Response to Comment Ind 765-6
DEIR section 6 considered project alternatives. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers. Solar manufacturing/generation and biofuel processing/generation would not achieve many of the project objectives and would also not be feasible as those businesses required specialized expertise not held by the applicant. Further, the commenter's description of these proposed alternatives is undefined, so it is unclear whether these proposals would avoid any significant impacts of the project or would create new significant impacts. As these proposed alternative uses do not achieve many project objectives, would not be feasible due to the need for specialized expertise, and are not formulated specifically enough that they could be shown to reduce any significant project impact, no further consideration is required.

Response to Comment Ind 765-7

This list is a summary of issues identified during the scoping process and helped guide which issues to analyze in the DEIR.

Response to Comment Ind 765-8

The commenter's concerns are noted. Mitigation Measure 4.1-2 requires the applicant to submit a Landscape Plan concurrent with improvement plan review and outlines the required information for inclusion in that landscape plan.

Response to Comment Ind 765-9

The comment is somewhat unclear and the request for daily air quality monitoring is not supported by the DEIR analysis. The commenter provides no substantial evidence as to why daily air quality monitoring would be needed. Nevertheless, it is noted that Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring.

Response to Comment Ind 765-10

DEIR Impacts 4.3-7 and 4.3-8 analyzed the project's contribution of greenhouse gases and recommended Mitigation Measures 4.3-7(a & b) to reduce the construction GHG emissions impact to a less than significant level. Operational GHG emissions are below the threshold and are therefore considered less than significant. As shown in this impact analysis, specifically Table 4.3-23, the entire life of the project was analyzed and not just construction. Please see Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Ind 765-11

As is standard practice, there are federal and state agencies that have the requisite expertise to monitor the successful implementation of biological mitigation measures concerning protected species.

Response to Comment Ind 765-12

Mitigation Measure 4.4-1(b) requires the preparation of a habitat management plan if special status plant species are identified during preconstruction surveys. The requirements listed in Mitigation Measure 4.4-1(b) are the minimum requirements for the habitat management plan and, during County review and approval, can be modified or changed to be more protective if necessary.

Response to Comment Ind 765-13

Mitigation Measures 4.4-2(a-g) outline the specific measures for protection of special status species that may be identified onsite.

Response to Comment Ind 765-14

Mitigation Measure 4.4-3(b) requires the preparation of a Watercourse/Wetlands/Riparian Areas management plan. The requirements listed in Mitigation Measure 4.4-3(b) are the minimum requirements for the habitat management plan and, during County review and approval, can be modified or changed. Native plants will be used for erosion control, when appropriate.

Response to Comment Ind 765-15

Mitigation Measure 4.4-3(c) provides for a variety of methods to mitigate the potential impact that will require consent and approval of the United States Army Corps of Engineers and/or California Department of Fish & Wildlife.

Response to Comment Ind 765-16

The authority to approve a Section 1600 Streambed Alteration Agreement is vested with the California Department of Fish & Wildlife. It is important to clarify that the County Land Use Development Code allows encroachments within non-disturbance buffers so long as an adequate Watercourse, Wetlands, and Riparian Areas Management Plan is prepared, approved by the County, and implemented by the Applicant, subject to County oversight. Said Management Plans have been prepared for the project (see DEIR Appendix F.5 and Appendix F.8).

Response to Comment Ind 765-17

The CEQA guidelines require analysis of substantial interference to "the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." Migration is defined as the seasonal movement of animals from one habitat to another. Various animal, bird, and fish species are not automatically considered migratory just because they move from one location to another. Migration serves a purpose for the species such as winter/summer habitat for foraging or breeding. It is acknowledged and analyzed in the DEIR impact analysis (see section 4.4.4) that species exist within the project site that are common to the area. Potential impacts to these species were analyzed and mitigation measures have been provided where it was determined impacts to species could occur as a result of project activities, including the implementation of preconstruction surveys and agency permitting requirements. The only migratory species corridors acknowledged by the County General Plan are deer migration corridors. Impact 4.4-4 addressed the project's impact to this potential migratory corridor and concluded that it would be less than significant.

Response to Comment Ind 765-18

The commenter does not provide any additional information and evidence to support a change in the significance determination.

Response to Comment Ind 765-19

As noted in DEIR section 4.5.4, and Appendix G, the Historic Properties Inventory and Finding of Effect included a cultural records search, literature review, consultation with the Nevada County Landmark Commission, consultation with the NAHC, and a field survey. The DEIR identifies the potential cultural resources onsite and includes mitigation measures to reduce the potential impact (see Mitigation Measures 4.5-1(a & b)). Given the sites' history of significant surface disturbance it is unlikely cultural resources are still intact. In the event unidentified resources are discovered, Mitigation Measures 4.5-2 and 4.5-3 require the appropriate coordination and consultation consistent with the California Environmental Quality Act, Secretary of the Interior, and County Code.

The County attempted to consult with interested tribal groups and none responded to the request for consultation within the statutory consultation timeframes (e.g., see responses to Group Letter 14).

Response to Comment Ind 765-20

The commenter does not provide any additional information and evidence to support a change in the significance determination.

Please see Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 35, Discharge to South Fork Wolf Creek.

Response to Comment Ind 765-21

DEIR Chapter 4.7, Hazards and Hazardous Materials, and Chapter 4.8, Hydrology and Water Quality, analyzed impacts related to hazardous materials and found all potential impacts to be less than significant after implementation of mitigation. The commenter does not provide any additional information and evidence to support a change in the significance determination.

Response to Comment Ind 765-22

The commenter does not provide any additional information and evidence to support a change in the significance determination. Please see Master Response 5 – Evacuation Zones.

Response to Comment Ind 765-23

The commenter does not provide any additional information and evidence to support a change in the significance determination. Please see Master Response 35 – Discharge to South Fork Wolf Creek. Water quality monitoring requirements are dictated by the Regional Water Quality Control Board who will have the authority to enforce water quality standards.

Response to Comment Ind 765-24

Mitigation Measure 4.8-5 requires the implementation of the Floodplain management plan. Requirements listed in Mitigation Measure 4.8-5 are to ensure that when working within 100 feet of the SFHA (100-year floodplain) that grading within the limits of the SFHA (100-year floodplain) shall be avoided. The 100-foot buffer from the SFHA floodplain is a different area than the 100-foot floodplain area and therefore the mitigation measure is not contradictory.

Response to Comment Ind 765-25

The commenter does not provide any additional information and evidence to support a change in the significance determination.

Response to Comment Ind 765-26

Noise monitoring required by Mitigation Measure 4.10-3 is continuous and reported to the County on a regular basis for review. The initial 30-day report is after the start of operations to ensure the noise predictions in the DEIR were accurate, and if County noise standards are exceeded, operations must cease until additional engineering controls to reduce noise levels can be implemented. After this initial analysis, analysis of the permanent continuous noise monitoring is required to be submitted to the County quarterly. The monitoring timing was independently reviewed by a third-party technical noise expert, under contract with Raney, who has experience conducting noise monitoring at active mine sites.

Response to Comment Ind 765-27

The commenter does not provide any additional information and evidence to support a change in the significance determination. Regarding drought concerns, please see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 765-28

The fair share percentage is based on the project's traffic volume it adds to the existing traffic levels. Requiring the applicant to pay 100% of traffic fees for only contributing a minor amount of traffic would be unconstitutional.

Response to Comment Ind 765-29

The commenter does not provide any additional information and evidence to support a change in the significance determination.

Response to Comment Ind 765-30

Mitigation Measure 4.12-6 requires the preparation of a traffic control plan for the construction phase of the project. The requirements listed in Mitigation Measure 4.12-6 are the minimum requirements for the traffic control plan and, during County review and approval, can be modified or changed by County Public Works. Please see Master Response 5 - Evacuation Zones.

Response to Comment Ind 765-31

The fair share percentage is based on the project's traffic volume it adds to the existing traffic levels. Requiring the applicant to pay 100% of traffic fees for only contributing a minor amount of traffic would be unfair.

Response to Comment Ind 765-32

The commenter does not provide any additional information and evidence to support a change in the significance determination. Please see Master Response 5 - Evacuation Zones.

Response to Comment Ind 765-33

DEIR section 4.13 analyzed the project's potential to increase wildfire risk. DEIR section 4.13.3 specifically identifies various State and County regulations including County General Plan policies, emergency operations plan, local hazard mitigation plan, and the County community wildfire protection plan. Consistency with these requirements and plans was analyzed in DEIR impact 4.13-1 and considered less than significant. Please see Master Response 6 - Wildfire Impacts.

Individual Letter 766

April 3, 2022

To Whom It May Concern:

I have been a resident of Nevada City since 2009 and immediately fell in love with its river, forest, flora and fauna. I am now a mother and a teacher who respects and honors the Nisenan people. Enough devastation has been carried out on their lands which they stewarded for thousands of years and continue to steward. As stewards of this land we must be conscientious as to how we treat our water, air, wildlife. This mine, no matter how well its presented, will devastate and dry wells, and release contaminants into the environment. I am opposed to this mine full stop. Below are some points from the Community Environmental Advocates Foundation which I echo:

Ind 766-1

Ind 766-2

"Dewatering the mine is a key concern. "Groundwater modeling in fractured rock systems is considered unreliable even when everything is done right," said Silberstein. According to experts, Rise Gold's model has fundamental flaws in the initial start point of the model and baseline data assumptions – all of which throw off the entire analysis. The result is a DEIR that concludes that groundwater levels would drop a maximum of 10 feet and no more than 30 local wells would be a risk. Experts, however, recognize the extremely high degree of uncertainty involved. Comments submitted to the County by the community and the Nevada Irrigation District (NID) include requests to expand the potential area of impact, provide a comprehensive groundwater monitoring program, and post a $14 million bond.

Ind 766-3

Dealing with mine waste is another major concern. "Looking at the rock core sample analysis, it is abundantly clear that asbestos will be a gnarly problem that will require comprehensive management. Mining operations don't get to just haul and dump rock like the days of old," said Silberstein. "Air and water quality regulations will significantly restrict throughput and the costs will be exorbitant." Experts found the plans to mitigate fugitive dust to be inadequate. They also found no credible evidence that the mine tailings could be effectively sold to 3rd parties for fill or offsite construction.

Ind 766-4

Climate change has increased forest fires and parched lands, resulting in the newest Federal and State greenhouse gas reduction goals. The DEIR used a threshold of 10,000 metric tons per year for greenhouse gas emissions but failed to include some elements that puts the project over that limit and makes it a significant impact. In the long run however, the limit defined in the DEIR is likely to be found irrelevant. Recent changes mean the County's threshold must be established at "net zero".

Ind 766-5

Following is a quick list of additional gaps in the draft:

- Cleanup of the toxic, pre-superfund Centennial site that would be used to dump mine waste is not included in the DEIR but is required by the California Environmental Quality Act (CEQA).

Ind 766-6

- Missing construction time estimates throw off the entire analysis of noise, traffic, and air.

Ind 766-7

- The DEIR incorrectly assesses nighttime noise and underestimates the noise of dumping mine waste near established residential neighborhoods.

Ind 766-8

- Air traffic hazards and aesthetic impacts need to be studied further due the likelihood of a massive fog plume that could be created by warm, saturated air ventilation.

Ind 766-9

- Blasting plans don't follow U.S. mining guidelines that restrict blasting during evening hours.

Ind 766-10

- The plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant.

- Meteorological data used to assess the health risk of airborne pollutants doesn't fit Grass Valley's profile or accurately reflect local conditions."

Ind 766-11

Please, please, preserve our human community and our animal and plant communities and DO NOT allow this mine to move forward.

Thank you,

Suzanne Hall

INDIVIDUAL LETTER 766: SUZANNE HALL

Response to Comment Ind 766-1
The commenter is opposed to the project for cultural and environmental impact reasons. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 766-2
The commenter states that the DEIR's analysis regarding the dewatering of the mine is flawed due to inaccurate baseline assumptions and the commenter requests that the DEIR expand its potential area of impact, implement a groundwater monitoring program and post a $14 million bond. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 766-3
The commenter is concerned with asbestos-related impacts and states there is no evidence that mine tailings could be sold to third parties for offsite construction. The commenter is referred to Chapter 4.3 of the DEIR, Master Response 23 - Adequacy of Asbestos Sampling, Master Response 22 - Conservatism of Asbestos Assumptions, Master Response 8 - Mine Waste Characterization, and Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Ind 766-4
The commenter states that the GHG threshold for air quality impacts must be net zero. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 766-5
The commenter states that CEQA requires that the cleanup of the Centennial Industrial Site be included in the DEIR. The commenter is refereed to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 766-6
The commenter states that the DEIR omits construction time estimates which skew the analysis of impacts. The commenter is referred to Master Response 24 - Project Construction Schedule.

Response to Comment Ind 766-7
The commenter states that the DEIR incorrectly assesses nighttime noise and underestimates noise of dumping mine waste near residential neighborhoods and that all work needs to be done during regular working hours. However, nighttime noise and dumping of mine waste is analyzed in the DEIR and is less than significant after mitigation. (DEIR, p. 4.10-31.) Please see Responses to Comments Grp 21-130 and Grp 21-131.

Response to Comment Ind 766-8
The commenter states that the DEIR must account for air traffic hazards and aesthetic impacts resulting from a potential fog plume. The commenter is referred to Response to Comment Grp 7-95.

Response to Comment Ind 766-9
The commenter states that the DEIR does not adhere to federal mining guidelines for blasting during evening hours. The commenter is referred to Response to Comment Grp 21-144.

Response to Comment Ind 766-10

The commenter states that the DEIR does not demonstrate the impacts to biological and aquatic resources would be less than significant but provides no further details. The commenter is referred to Chapters 4.4 and 4.8 of the DEIR.

Response to Comment Ind 766-11

The commenter states that meteorological data used in the health risk assessment does not reflect local conditions. The commenter is referred to Master Response 17 - Meteorological Data Used in HRA. The commenter's opposition to the project is noted for decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 767

March 30, 2022

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA. 95959-7902

RE: Review of the Draft EIR for the Proposed Idaho-Maryland Mine

Dear Matt Kelley,

Thank you for the opportunity to comment on the Draft EIR for the proposed Idaho Maryland Mine project, State Clearinghouse Number 2020070378. My comment are included below.

Ind 767-1 Overall the document is difficult to read and cumbersome as well as incomplete in its review of many issues on the proposed project as well as discussion on the Reclamation Plan and documents. The Reclamation Plan is a project under CEQA and the impacts must be analyzed in a CEQA document. Including brief discussions on the Reclamation Plan in different sections of the DEIR does not constitute full CEQA review of the project.

The following section is a discussion on Land Use includes comments on the County's processing of the project's rezoning proposal, which should be discussed in the analysis of this project. My comments on the rest of the DEIR follow this section.

Land Use

Volume 1 - page I-1 of the Nevada County General Plan:

Ind 767-2 The County, in response to key issues affecting the County's quality of life, has established four central themes which articulate the vision for the development of the County:

1. Fostering a rural quality of life;
2. Sustaining a quality environment;
3. Development of a strong diversified, sustainable local economy; and
4. Planned land use patterns will determine the level of public services appropriate to the character, economy and environment of each region.

Section L-II 1.1 Authority and Purpose Nevada County Zoning Ordinance

The zoning ordinance is adopted in order to achieve the following objectives:

A. To serve as the primary tool to implement and ensure consistency with the goals, objectives, and policies of the Nevada County General Plan based upon the following central themes:
   1. Fostering a rural quality of life.
   2. Sustaining a quality environment.

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3. Development of a strong diversified, sustainable local economy.
4. Planned land use patterns to determine the level of public services appropriate to the character, economy, and environment of each region.

Both the General Plan and Zoning Ordinance have as key issues for consistency for development within the County the "Fostering of a rural quality of life, sustaining a quality environment, development of a strong diversified, sustainable local economy, and planned land use patterns to determine the level of public services appropriate to the character, economy, and environment of each region, A project requiring a rezoning to mining uses partially located within the Rural Region of the County (inconsistent with the General Plan) adjacent to residential uses, does not provide the consistency with General plan or Zoning Ordinance envisioned by the creators of the documents. Beyond showing which General Plan policies the proposed project is attuned to the Draft EIR should provide the Policies that the project is not in compliance with.

The County's Zoning Ordinance, Section L-II 1.4, Rules of Interpretation for the rezoning of the SP portion of the project requires findings 1 through 4, see section below, for the removal of the SP Zoning District and the application of the ME zoning, which is required for mining uses. The Rules of Interpretation, as shown below, allow for the Planning Director to determine an allowable use, if the Director finds the use will, among other findings, share characteristics common with those listed in the district and not be of greater intensity of density, generate greater impact on public facilities and services, or generate more environmental impact than the uses listed n the district.

Ind 767-3

The Rezoning from M1-SP site performance standards applied to Ordinance 1853, adopted in January 18, 1994 by the Nevada County Board of Supervisors, to the M1-ME zoning district allows for a major intensification of uses and environmental impacts, not consistent with the zoning district, or the rules of interpretation of the Zoning Ordinance.

Ordinance 1853 is specific as to uses allowed within the district, listing uses, noise, air pollution("1. The use of any materials subject to becoming airborne shall only be permitted if it is demonstrated that no significant air pollution will result. 2. Refuse burning shall be permitted. 3. Any odors which interfere with the comfort of the adjacent residential uses and/or workers on site shall be prohibited).", hazardous materials, circulation, lighting, landscaping requirements, etc. The SP application to the M1 zoning clearly acknowledged that the adjacent residential uses were to be protected from heavy industrial use.

Section L-II 1.4, Rules of Interpretation

D. Zoning District Land Use Interpretation. If a proposed use of land is not listed in Article 2 (Zoning Districts), the Planning Director may determine the use to be allowable if the Director finds the use will:

1. *Be consistent with the goals, objectives, and policies of the Nevada County General Plan; and*
2. *Meet the purpose and intent of the zoning district that is applied to the site; and*
3. *Share characteristics common with those listed in the district and not be of greater intensity or density, generate greater impact on public facilities and services, or generate more environmental impact than the uses listed in the district; and*
4. *Be treated in the same manner as the listed use including determining where it is allowed, what permits are required, and what standards affect its establishment.*

Further the Zoning Ordinance requires that:

Determinations that specific unlisted uses are equivalent to listed uses will be recorded by the Planning Department, and will be incorporated into the ordinance when amendments to the ordinance are next considered.

And allows for a public hearing:

The Planning Director may forward questions concerning equivalent uses directly to the Planning Commission for determination at a public hearing.

And an **Appeal** process available to the public:
Section L-II 1.4, E. Appeal. Any determination or interpretation by the Planning Director may be appealed to the Board of Supervisors consistent with Article 5 of this Chapter.

This information needs to be discussed and included in the Land Use section of a revised Draft EIR available for public comment.

Transportation

The application package for the proposed reopening of the mine submitted to Nevada County suggested that the additional 69 years of mine waste would be sold off site for local projects. The Draft EIR proposes that the mine "engineered fill" be distributed throughout various local counties after the first 11 years in which the Brunswick and Centennial sites will be filled, and the fill must be transported somewhere else.

Ind 767-4

Page 9, II.3.a. Heavy Truck Vehicle Miles Traveled, KDAnderson, Traffic Impact analysis, states:
Heavy trucks can be included in VMT analysis for convenience, but are not the subject of the new CEQA requirement. In this case, inclusion of heavy trucks would not be convenient and rather would make the EIR's traffic analysis confusing.

The Draft EIR must be revised to include impacts from heavy trucks and include impacts to Hwy 49, including noise from "Jake breaks." Inconvenience is not a CEQA related reason to omit necessary traffic analysis. Please include this analysis in a Revised Draft EIR.

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DEIR page 21:
Trucks would transport barren rock from the Brunswick Industrial Site to the Centennial Industrial Site or Brunswick Industrial Site engineered fill areas. Transport of barren rock to the Centennial Industrial Site would occur 16 hours per day, seven days per week. An approximately 44-acre area of the 56-acre Centennial Industrial Site would be filled using engineered fill from the Brunswick Industrial Site over approximately five years. Engineered fill would be hauled to either the Centennial site or to off-site construction sites and mining concentrate would be shipped off- site via State Route (SR) 49.

The project needs to include full estimated analysis beyond the first 11 years. Traffic impacts to the County and Hwy 49, Hwy 174, and Hwy 20 need to be included in the analysis. Guessing that 69 years of "engineered fill" will be able to be sold off site to other projects leaves the CEQA analysis incomplete.This needs to be further analyzed in a revised Draft EIR.

Hydrology and Hydraulic Calculations, Nevada City Engineering, Vol IX, AppendixK-5

Pages 4-9. Calculations and runoff coefficients used for the analysis make no sense here. The "engineered fill" a both sites must be compacted to Urban Use Standards pursuant to SMARA.

Ind 767-5

The coefficients in a standard Rational Method of calculating runoff requires 0.9 be used for roofing and pavement, gravel pavement 0.85 (which may be the valid value for the engineered fill piles), side slopes, earth (prior to revegetation) 0.60, side slopes turf 0.30, etc. Coefficients used in the evaluation of post project runoff do not account for roofing, compacted engineered fill, roadways, etc.

It is impossible for the proposed Post-project to have less runoff than the Pre-project. These calculations are part of the Reclamation Plan as well as the proposed operational plan. This information needs to be recalculated and included in the text and mapping of the DEIR, in a revised Draft EIR for public review for both the Pre-project and the Post project estimates for the proposed Drainage Plans.

Ind 767-6

Detention Study, Nevada City Engineering: *On-site fills are proposed to be constructed at a slope ratio of 3:1. Under this scenario, due to the relatively mild gradient, mid slope benches will not be required. Where slope banks are great enough in height to require mid-slope interceptor ditches, "J" Ditches as indicated on the detail included on Page 14 of this study will be provided. These will eliminate any likelihood of erosion occurring on the slope faces. Additionally, the 3:1 slopes have a softer, more natural look which will make the proposed ultimate development of the engineered fill areas into industrial parks more aesthetically pleasing than benched slopes. These flatter slopes will also enhance the viability of landscaping and vegetative efforts on those slopes.*

Please provide calculations and verification that slopes are stable. Additionally the DEIR states that vegetative grasses will not need irrigation and they

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will need irrigation. This information would be included in a Revised Draft EIR, Reclamation plan, and water estimates.

Improvement Plan proposed as Mitigation

Page 2-86 of the DEIR Impact 4.8-3 states *"As part of the Improvement Plan submittal process, the applicant call submit a Final Drainage Report to the County Planning Department for review and approval. The Final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement Plans to confirm conformity. The report shall address the Centennial and Brunswick Industrial Sites, prepared by a Registered Civil Engineer, and shall, at a minimum include: narrative describing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements to accommodate flows from this project, including treated mine water and mine water discharge and stormwater runoff. The Final Drainage Report shall demonstrate the on-site storm drain systems are sized such that site runoff (in addition to treated mine discharge for the Brunswick Industrial Site) under the post development will not exceed predevelopment levels in the downstream channel(s) during design storm events.*

Ind 767-7

The requirement that the applicant adopt mitigation measures recommended in a future study is in direct conflict with the guidelines implementing CEQA. CEQA's mandates that significant environmental impacts and feasible mitigation measures be meaningfully analyzed prior to project approval. This information should be completed now and included in a Revised Draft EIR.

Ind 767-8

Further, PRC 2773(a), and (b)(4) require that "The Reclamation Plan shall establish site specific sediment and erosion control criteria for monitoring compliance with the reclamation plan." It is unclear as to when the County intends to complete the CEQA review of the Reclamation Plan, but this information should be included as part of the Reclamation Plan for public review.

Ind 767-9

First and foremost CEQA requires a public friendly environmental document. It appears that much has been done to make the review of this document difficult for the public to review and understand. This document is overly lengthy and confusing for the reader. Please edit and resubmit as a revised Draft EIR.

Sincerely,

Suzanne Smith
PO Box 2176
Nevada City, CA 95959

INDIVIDUAL LETTER 767: SUZANNE SMITH

Response to Comment Ind 767-1

The commenter states that the DEIR does not fully analyze the reclamation plan, but does not explain its assertion that the DEIR's analysis of the reclamation plan is inadequate. This is an introductory comment and does not provide a comment on an environmental issue associated with the project. Please see Master Response 1.

Response to Comment Ind 767-2

Comment noted. Please see Master Response 1 - Non-EIR/ Administrative Issues regarding quality of life concerns. DEIR Chapter 4.9, Land Use and Population and Housing, addresses potential project conflicts with applicable County General Plan land use goals and policies and zoning code requirements, and concludes that the project would be generally consistent with County policies.

Response to Comment Ind 767-3

Please see Master Response 1 - Non-EIR/ Administrative Issues regarding quality of life concerns. DEIR section 4.9.2 identified the applicability of Nevada County Ordinance No. 1853 creating the SP zoning district and that the Brunswick Industrial Site was designated M1-SP (see Table 4.9-2 and Figure 4.9-2). As discussed in the DEIR Project Description, section 3.8, the applicant has requested a rezone to the parcels located at the Brunswick Industrial Site from M1-SP to Light Industrial with Mineral Extraction Combining District (M1-ME). As a result, the DEIR does not analyze the project's consistency with the SP zoning district and sufficient detail was provided to inform reviewers of the site's existing zoning and requested amendment.

Response to Comment Ind 767-4

The commenter asserts that transportation of engineered fill to supply local and regional markets was not analyzed in the DEIR; however, this activity and its associated impacts were analyzed in the DEIR. As described in Chapter 3.0 of the DEIR, the project proposes placement of engineered fill at both the Centennial and Brunswick Industrial Sites over the course of 11 years. After completion of engineered fill placement at the project site, engineered fill would be transported offsite and supplied to construction aggregates market. As described in DEIR Project Description section 3.7, a maximum of 2,000 tons per a day of engineered fill could be transported offsite. This would result in an average of 50 round trip truck trips, or a maximum of 100 round-trip truck trips, per a day of engineered fill. Hauling of engineered fill (barren rock and sand tailings) would shift entirely to be utilized in local and regional construction markets.

This aspect of the project was analyzed in numerous portions of the DEIR including traffic, air quality, greenhouse gases, and noise. As discussed in DEIR Chapter 4.12, Traffic (subsection 4.12.4), engineered fill assumptions consistent with the volume outlined above was analyzed as project trip generation (see Table 4.12-7). The DEIR analyzed project trip generation contributions to both existing plus approved project conditions and year 2035 cumulative conditions. Analysis included 24 intersections, including intersections along State Route 174, State Route 49, and within the City of Grass Valley.

Regarding truck traffic noise and the use of jake brakes, DEIR Chapter 4.10, Noise and Vibration, analyzed the trucks trips potential impact to increase noise levels along the haul route. As determined in DEIR Impact 4.10-2, haul truck vehicle noise would not substantially increase noise levels at the nearest residences along the haul route (see Table 4.10-15) except:

> *"However, it should be noted that the results presented above do not account for the use of jake brakes. In the event that jake brakes are used by project haul trucks operating between the Brunswick and Centennial Industrial Sites, the potential exists that a substantial increase in ambient noise levels could result from the project at the sensitive receptors located along that haul route." (Draft EIR page 4.10-35)*

As a result, the DEIR provided Mitigation Measure 4.10-2 which requires:

> *4.10-2 Haul truck operators shall be required to operate their trucks in such a manner so as to not require the use of jake brakes along the project haul routes. The Project Applicant shall post signage at the exits of both the Centennial Industrial Site and Brunswick Industrial Site informing drivers that the use of jake brakes is not permitted. Additionally, drivers directly employed by the Project Applicant, as well as any contract drivers, shall be required to abstain from use of jake brakes as a company policy. Proof of sign postage (e.g., photographic documentation) and a copy of the company policy language shall be provided to the Nevada County Planning Department prior to commencement of hauling. In the event that jake brake usage associated with project-related heavy truck traffic is observed, the Project Applicant shall implement additional measures to educate drivers regarding the safe operation of their vehicles without the use of jake brakes or take disciplinary action, if required, to the satisfaction of the Nevada County Planning Department. In addition, haul trucks shall be fitted with broad-band "growler" type back-up warning devices rather than the conventional "beeper" devices.*

As demonstrated above, engineered fill truck trip generation and the use of jake brakes was analyzed in the DEIR.

Response to Comment Ind 767-5

The Surface Mine and Reclamation Act section 3704(a), Performance Standards for Backfilling, Regrading, Slope Stability, and Recontouring, states:

> Where backfilling is proposed for urban uses (e.g., roads, building sites, or other improvements sensitive to settlement), the fill material shall be compacted in accordance with the Uniform Building Code, published by the International Conference of Building Officials and as adopted by the lead agency, the local grading ordinance, or other methods approved by the lead agency as appropriate for the approved end use.

As stated in Appendix K.5, hydrologic calculations were developed utilizing the unit hydrograph method. The coefficients for Rational Method supplied by the commenter are not applicable to the analysis of the post-project drainage in the project area because the rational method was not used. As stated in Appendix K.5, the hydrologic calculations and detention studies for both sites anticipate runoff at full development. Therefore, when mining operations are completed, all potential increases in runoff due to increases in impervious surfaces (pavement and buildings) will already be accounted for.

The rational method is only used to confirm the sizing of two culverts for the project as shown in bullets 6 and 7 on pages 7 and 8 of Appendix K.5. A Coefficient of Runoff for use in the Rational Formula (C) is calculated in order to determine the required size of Drainage culverts for subarea A-2 and B-3. In accordance with the Nevada County Land Use and Development Code Sec L-XVIII 5.1 (B), the runoff coefficient shall be determined using Standard Drawing D-15. Subarea A-2 is the off-site area of unimproved forested land and industrial land that drains towards an existing culvert that directs water onto the Centennial site (see figure H-2 of Appendix K.5). Subarea B-3 is the off-site area of sparse residential development and forest that drains towards

the existing 48-inch culvert on Brunswick Road (see figure H-4 of Appendix K.5). The calculation sums factors in accordance with the table for estimating "C" in Rational Formula for unimproved areas presented in Standard Drawing D-15. Appropriate and conservative C factors were used to confirm the sizing of these two culverts.

https://www.nevadacountyca.gov/DocumentCenter/View/6277/Nevada-County-Standard-Road-Drawings-PDF?bidId=

The commenter states that it is impossible for post-project conditions to have less runoff than pre-project conditions. However, as discussed in the DEIR, the project uses storm water detention basins to reduce peak flow in streams during storms below pre-project levels. The design and calculations for the storm water detention ponds are shown in the DEIR.

Response to Comment Ind 767-6

The commenter asserts that the DEIR needs to provide calculations that prove the fill slopes will be stable; however, calculations on fill slope stability are provide in Appendix H.1. The fill slope design of 3:1 (30%) is significantly shallower than the maximum of 2:1 (horizontal : vertical) recommended by NV5 in the Geotechnical Report (see Section 5.1.9 of Appendix H.1).

The commenter also asserts that the vegetative grasses proposed for the project site will require irrigation, which should be analyzed in a revised DEIR. As discussed in Section 5.8.1 of the Reclamation Plan (Appendix C of the DEIR), the hydroseed mix proposed is consistent with erosion control seed mixes used by Caltrans and County Public Works in the surrounding area. Irrigation will be used as necessary to support revegetation. If irrigation is required, revegetation will be shown to be self-sustaining for two-years prior to release of the financial assurance cost estimate.

As stated on page 9 of the water supply assessment (Appendix N), because the WSA is assessing the impacts at buildout of the proposed project, the water demand during construction (including any irrigation to support revegetation) is not included in buildout water demands.

Response to Comment Ind 767-7

A Preliminary Drainage Analysis (PDA) (Nevada City Engineering, 2019) was prepared and included as DEIR Appendix K.5. As described in DEIR section 4.8.4, the PDA was peer reviewed by the County and potential impacts were analyzed in Impact 4.8-3. As stated in the conclusion to Impact 4.8-3:

> "The drainage analyses discussed above conclude that the project would not significantly alter the drainage patterns of the sites in a manner which would result in substantial erosion or siltation on- or off-site, nor substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, nor create or contribute to runoff water which would exceed the capacity of existing stormwater drainage systems, nor impede or redirect flood flows." (DEIR page 4.8-75)

Despite this conclusion, the DEIR conservatively concluded a potential significant impact due to "regulatory compliance"; specifically, the County requires a final drainage analysis be approved by County Public Works prior to development. The DEIR provides sufficient information to inform a reader on the potential environmental issue and associated impact and provide a meaningful opportunity to comment.

Response to Comment Ind 767-8

As provided in DEIR section 3.8, Requested Discretionary Actions, the Reclamation Plan will be considered for approval in conjunction with the Use Permit for the project.

The Reclamation Plan, included as Appendix C to the DEIR, addresses the requirements of PRC 2773(a) in sections 5.3, 5.5, 5.8, and 5.10. In addition, Appendix G of the Reclamation Plan includes the Nevada City Engineering Preliminary Drainage Analysis providing stormwater flows and capture calculations for the reclaimed condition of the site.

As discussed in the sections outlined above, and Appendix G, the project and Reclamation Plan includes the use of culverts, drainage swales, detention basins, revegetation, and other means to control onsite erosion. Section 5.8.4 of Appendix C describes revegetation success criteria and Section 5.8.5 describes monitoring and maintenance of revegetated areas. Grading, drainage and erosions control are discussed in Section 5.5.

Response to Comment Ind 767-9

The commenter asserts that the DEIR is overly long and confusing. The DEIR is the length necessary to address the environmental impacts associated with the project, and those raised by the public. This comment does not address an environmental issue associated with the project, but has been forwarded to the decisionmakers for their consideration.

Individual Letter 768

From: Suzi Kerston <suzi@suzikerston.com>
Sent: Monday, April 4, 2022 1:25 PM
To: Matt Kelley
Cc: Suzi Kerston
Subject: RE: March 24, 2022 Special Planning Commission Meeting

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Ind 768-1

Matt:
Here are my questions concerning the mine:
Why did the TCSC stop the retesting of the Idaho Mary toxic investigation when Rise Gold arrived?
How specifically are they going to manage the Arsenic and Asbestos once it is airborne and in the water?
How are they going to manage the Fog Plume and green house affects?
Who is going to make them accountable for the noise levels that were grossly understated in the EIR?
Thank you
Suzi Kerston
530-305-3312

From: Matt Kelley <Matt.Kelley@co.nevada.ca.us>
Sent: Thursday, March 24, 2022 6:43 AM
To: Suzi Kerston <suzi@suzikerston.com>
Subject: March 24, 2022 Special Planning Commission Meeting

Good Morning Suzi:

Thank you, I have received your voicemail message. The Special Meeting of the Nevada County Planning Commission is scheduled to take place from inside the Board of Supervisors Chambers with the meeting being open to in-person attendance. All verbal public and agency comments on the adequacy of the Draft EIR will need to be made in-person at the meeting. The meeting will be broadcast live on Nevada County Media Channel 17 in Western Nevada County and on Suddenlink Channel 78 in Eastern Nevada County. The meeting can also be viewed live through the web at: http://nevco.granicus.com/ViewPublisher.php?view_id=19. Below is a link to the Planning Commission Agenda along with a link to the Notice of Availability.

March 24, 2022 – Special Meeting of the Nevada County Planning Commission Agenda
https://www.mynevadacounty.com/AgendaCenter/ViewFile/Agenda/_03242022-1383

Notice of Availability to provide comments on the Idaho-Maryland Mine Project EIR
https://www.mynevadacounty.com/DocumentCenter/View/42256/NOA-Comment-Period-Extension-Final

Idaho-Maryland Mine – Rise Grass Valley Project Website
https://www.mynevadacounty.com/3195/Idaho-Maryland-Mine---Rise-Grass-Valley

Thank you Suzi, and if you have any additional questions, please let me know.

1

Matt Kelley
Senior Planner

Planning Department
County of Nevada
Community Development Agency

950 Maidu Ave, Suite 170 *office 530 265-1423*
PO Box 599002 *https://www.mynevadacounty.com/512/Planning-Department*
Nevada City, CA 95959-7902

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I am out of the office every other Friday as follows: 1/7, 1/21, 2/4, 2/18, 3/4....

PLANNING PUBLIC COUNTER NOTICE

The Customer Service Counter for Nevada County CDA - Planning Department is open from 8:00am – 3:30pm for new application submittals and appointments. Walk-ins are welcome from 8am to 5pm. To schedule an appointment with staff please contact the Planning Department at 530-265-1222, Option 2 or planning@co.nevada.ca.us. If you have any questions about our services, please contact us by email at planning@co.nevada.ca.us or by phone at 530-265-1222 Option 2.

INDIVIDUAL LETTER 768: SUZI KERSTON

Response to Comment Ind 768-1

The commenter's reference to TCSC is unclear. Arsenic and asbestos are addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. For the commenter's fog plume reference, please see Response to Comment Grp 7-95. Greenhouse gas effects are addressed in Chapter 4.3; please also see Master Response 27 – Greenhouse Gas Thresholds and Master Response 28 – Greenhouse Gas Credits.

Individual Letter 769

Matt Kelley
Senior Planner, Nevada County Planning Department
950 Maidu Avenue Suite 170
Nevada City, CA 95959-7902
April 4, 2022

Subject: Comments on Rise Gold Idaho Maryland Mine DEIR

Dear Mr. Kelley:

I am writing to express my dismay over the inadequate and flawed draft environmental impact report prepared for the Rise Gold Idaho-Maryland Mine project.

I attended the special planning commission meeting on March 24, 2022 and was very impressed with the depth of analysis and civic community engagement on display that day. While I have little to add to the record over and above the analysis and comments prepared by the public and agencies, I would like to add my concerns over several specific issues:

Empire Mine State Historic Park is set aside for the public to enjoy and appreciate, and learn from. The park has experienced ongoing issues inherited from legacy mining impacts, and even with the relatively deep pockets of the state, and the commitment to improving environmental conditions, those negative impacts associated with water, toxic chemicals (arsenic, mercury), subsidence and collapse remain today, long after the active mining pursuits have been curtailed. The proposed project would have significant and unavoidable impacts to the park, from underground plumbing effects, to noise and aesthetics. Groundwater and surface water are inextricably linked, and the subsurface complex geology of fractures and faults render the transport paths of fluids in unpredictable ways.

Ind 769-1

The very thought of an active industrial mine surrounded by quiet parks, and residential areas is an abhorrent one. The zoning of the two sites should prohibit even the prospect of the project as untenable.

The county's general plan and zoning should be relied upon to be consistent and any thoughts to change to mining extraction would devalue the surrounding properties significantly.

The huge engineered fills would tower above the surrounding terrain. The visual impact would be astonishing, and the unconsolidated materials would be subject to erosion and movement, eventually impacting Wolf Creek.

Since the Centennial site has yet to be cleaned up under a separate DTSC project, future use and additional negative impacts to this location are yet to be resolved.

Ind 769-2

Ind 769-3

Unfortunately our community has experienced multiple cycles of gold mine re-activation proposals, and failed enterprises due to inadequate planning, execution and management.
Our community is steeped in gold mining history and legacy impacts we continue to struggle with. While the mining activities soften with time and through the lens of nostalgia, modern techniques are at odds with an economy based on tourism and environmental quality.
I strongly recommend that the Planning Commission make the determination that the proposed project is a non-starter, and save our community the additional time and expense to carry forward additional oppositions to a project virtually no one wants, save for the gold-fevered investors and the Rise Gold principals.
So, no to the re-zone request, no to the use permit, and no to any variance requests. With these noes in hand, hopefully the project can be abandoned, for all time.
Sincerely,
Syd Brown
14124 Honeysuckle Way
Nevada City, CA 95959
sydneylloydbrown@gmail.com

INDIVIDUAL LETTER 769: SYD BROWN (1)

Response to Comment Ind 769-1

The commenter expresses concerns regarding the project's adverse effects on Empire Mine State Park, which are addressed in the responses to Agency Letter 1. Agency Letter 1 is authored by the California Department of Parks and Recreation. For concerns related to engineered fill piles, please see Master Response 8 – Mine Waste Characterization.

Response to Comment Ind 769-2

Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 769-3

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 770

From: Syd Brown <sydneylloydbrown@gmail.com>
Sent: Tuesday, February 1, 2022 4:05 PM
To: Idaho MMEIR
Subject: Requesting extension of comment period for Idaho Maryland Mine DEIR

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Ind 770-1

I request that Nevada County extend the comment period for the Idaho Maryland DEIR. The 60 day comment period is insufficient to review and analyze the complex aspects of this project. Please provide the necessary time to enable thoughtful and accurate evaluations of the potential impacts associated with the proposed project. With the power and internet outages from the storm still wreaking havoc in the county, and the limitations to in-person library access, extending the comment period seems to be only reasonable.
Thank you.
(Ms.) Syd Brown
she/her
530.205.7068

1

INDIVIDUAL LETTER 770: SYD BROWN (2)

Response to Comment Ind 770-1

Please see Master Response 1. With regard to the public comment period for the DEIR, the comment period lasted for 91 days, starting on January 4, 2022 and ending on April 4, 2022.

Individual Letter 771

From: Sylvia Otton
To: bdofsupervisors
Subject: Idaho-Maryland Mine
Date: Thursday, February 17, 2022 10:00:47 AM

Cannot identify Dist

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Ind 771-1

I vehemently OPPOSE the reopening of the Idaho-Maryland Mine.

My family moved to Nevada County from Southern California 20+ years ago to enjoy a cleaner, quieter life. We own a home, eat, shop, recreate, and plan to retire here. The Mine is detrimental to our quality of life and will cause many of your constituents to leave the County.

Bad idea, Sups!

Thank you for your time.

INDIVIDUAL LETTER 771: SYLVIA OTTON

Response to Comment Ind 771-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration. Quality of life concerns are outside the scope of CEQA. Please see Master Response 1.

Individual Letter 772

From: Tamara Snyder
To: bdofsupervisors
Subject: No on mine
Date: Thursday, February 17, 2022 9:20:07 PM

Dist 1

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Ind 772-1

Please vote NO on the mine project in our town. We don't need anymore negative environmental issues to deal with. My health and our children's current and future health is far more important than money. Greed cannot win!

Let your conscious be your guide. Vote NO on mining in our neighborhood.

Sincerely,
Tamara Snyder

Sent from my iPad

INDIVIDUAL LETTER 772: TAMARA SNYDER

Response to Comment Ind 772-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration. Please see Master Response 1.

Individual Letter 773

Matt Kelley,
Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 94959-8617

Mr. Kelley:

Please add my name and company to the ranks of supporters of re-opening the Idaho-Maryland mine – an essential project for the future of Nevada County and our local businesses.

I have worked with the team at Rise Grass Valley, and I have confidence in their plan to bring a vibrant new business to our community. The time that they were here, it boosted my business and numerous others. Rise Gold predicts creating 312 new jobs in our county in an era where working families are suffering more and more from low wages and high unemployment.

Ind 773-1

Rise Gold is offering ON AVERAGE $94,000 in wages for these positions – almost $50,000 more annually that the current average wage in the county. This doesn't even count the much more significant potential of 4.7 indirect jobs created for every one job Rise creates directly. My business and scores of others will be lifted by this project, allowing us to have greater security and offer a brighter future to our own employees Passing up this opportunity to build a state-of-the-art clean mining operation right here in Grass Valley would be a foolish mistake.

I urge the Board of Supervisors and Planning Commission to avoid the baseless and desperate attacks from extreme anti-business voices in our community and approve this project so that Nevada County can build for a more prosperous future.

Sincerely,

Tammy McCrary, Owner
Foster and Son Hose and Fittings
780 Whispering Pines Lane
Grass Valley, CA 95945

INDIVIDUAL LETTER 773: TAMMY MCCRARY

Response to Comment Ind 773-1

The commenter's support for the proposed project has been noted for the record and forwarded to the decision-makers for their consideration. Please see Master Response 1.

Individual Letter 774

From: Tandra Webb <wtandra1@gmail.com>
Sent: Monday, April 4, 2022 1:07 PM
To: Idaho MMEIR
Subject: No mine

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Ind 774-1

In my opinion the mine will have horrific consequences on this community/wildlife. And all over greed. The future of this town will become lost. And eventually a ghost town as it will become unlivable due to the destruction that will be caused within time. Do not re open the mine it will destroy this community and wildlife. This company will say whatever to get it open. And lie. They are dirty. And are only about greed and not the welfare of life. Itself.
Sent from my iPhone

INDIVIDUAL LETTER 774: TANDRA WEBB

Response to Comment Ind 774-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project, which has been noted for the record and forwarded to the decision-makers for their consideration. Please see Master Response 1.

Regarding the commenter's generally noted concerns about project effects on wildlife, please see Chapter 4.4, Biological Resources.

Individual Letter 775

1 of 12

April 4, 2022

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

email:idaho.MMEIR@co.nevada.ca.us

To the Nevada County Board of Supervisors,

I write as a concerned 35-year resident of Nevada County, a retired University of California history professor (Ph.D. UCLA in U.S. History, 1987), and active member of Nevada County Historical Society.[1] My most recent book is The Nevada City Nisenan (2022). My father resided Atria Grass Valley at 150 Sutton Way until his death in 2016. The impacted area and its various businesses and roads are very familiar to me.

Ind 775-1

Having read the **entire** EIR, **I strongly oppose reopening the Idaho-Maryland Mine.** The draft EIR is misleading in its manipulative selectivity and its omissions, creating a false impression of the relative harmlessness of the mine's dire impacts. Far more scientific research is necessary to protect the environment: the mitigations proposed are far from adequate. I respectfully offer my two part analysis of why approval is a grave mistake for this county:

Part I: Environmental/Quantitative: Of 83 identified impacts, 30 were deemed "significant and only 3 found "unavoidable." I find the analyses of those mine opponents with scientific expertise in the community, such as the CEA, persuasive: that baseline studies on air and water are not current, groundwater models faulty, and mitigations insufficient. That County residents should be subject to **any** increase in traffic, **any** deterioration in air or water quality, or **any** dangers from potential accidents is **unacceptable**. My questions and comments are directed at my primary concerns.

Ind 775-2

I. Insufficient research on wind patterns: No where in this EIR is a scientific analysis of wind patterns in the impacted area. Such in-depth study is necessary given the mortal danger of windblown pollutants like asbestos dust. Rise Gold acknowledges this hazard and offers to mitigate by drawing on NID water to tamp down the dust. **Addressing one problem by creating another (a huge draw on water in a mega-drought) is not a viable solution**: it is a double environmental hit on our air and water. Given the grave severity of air-borne pollutants, Rise Gold should be required to do much more investigation and explication and mitigation than they currently offer. There are, as I understand it, two sources of airborne contaminants: dried mud from the dewatered mine [2] and asbestos-laden mine-rock brought to the surface in stupendous volumes. I should like to know more about the process of monitoring and containing such pollutants. Finally, as a known pattern of climate warming

Ind 775-3

[1] tanisthorne.com The book includes a chapter on mining by Hank Meals.
[2] "The water coming from these mines [after dewatering] that they're dewatering is full of arsenic, manganese, iron, and other heavy metals," says the biologist Josie Crawford, the executive director of the Wolf Creek Community Alliance, another local group that opposes the mine. "It will be treated, but it needs to be treated forever." Quoted in the Atlantic, Jan. 30, 2022.

we currently experiencing (such as the winter storm of December 2021) is increasingly erratic and intense weather events,[3] worst-case scenerios for wind events should be anticipated, not the best case scenerios anticipated in the EIR. The erection of wind barriers around the areas where mine rock at industrial sites, addresses only one small phase where such fibers could escape into the air. Rise Gold should be required to more than a "half-baked" analysis. The mitigations offered are inadequate.

Ind 775-4

II. How often will the mine rock be tested for dangerous contaminants before piled up at the industrial sites or loaded on trucks? How will asbestos-laden rock be segregated from other waste rock? How will contaminated rock be treated? Who will do the monitoriing and who will pay? Then, there is the rather serious issue, which the MEIR does not address of long-term leakage and wind-borne contamination in the "recuperated zones" of so-called "engineered" mine rock **The mitigation proposed** (as above) **which creates yet another "significant and unavoidable" aesthetic impact** —and more frighteningly a legacy of poison for our descendants—**is unacceptable**: viz. mine rock disposal creating 165-foot tall towers. (Likewise, the "solution" to disposal of mine rock exported by trucks, creates at least two "unmitagatable" impacts.)

Ind 775-5

III. Insufficient research on contaminants entering the South Fork watershed. Given the danger not only to County residents and biotic environment, but potentially millions more lifeforms living downstream to the Delta and beyond, there needs to be more pre-testing, monitoring by 3rd parties and more precautionary measures in place in the event of storm events (627) Once water from the dewatered mine be brought to the surface, County residents have a right to know what contaminants are in the water, and how treated, and what the chemical analysis is prior to being released into the South Fork. New testing should be done to test water quality now. Again, worst-case scenerios should be anticipated—an extreme flood event—to prevent overflow of contaminated, untreated water from the catchment ponds into the river. The mitigations, while offering some protections against flood events (628) are inadequate (699). Rise Gold should be required to pay the Wolf Creek Alliance or other independent 3rd party for regular monitoring.

Ind 775-6

IV. Unprecedented historic drought conditions have altered conditions, requiring recalibration of the water use projections deemed "insignificant. 42,000 gpd for dust suppression for 6 years may we more than NID can spare. Already, according to Section 11.5, the demand expected to exceed supply in dry years. (840) The mitigation proposed is that additional water could be supplied from the Bear River drainage has no realistic basis. California has mandated water conservation and water is over-allocated everywhere—in other words there are far more stakeholders promised water than there is water.[4] A more accurate hydrologic model is needed to address concerns about groundwater impacts for all well owners in the impacted area, whose concerns have been slighted. EmGold acknowledged the potential threat to well-owners was more serious and widespread. Rise Gold has underestimated the threat to well owners.

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[3] "How Bad Is the Western Drought? Worst in 12 Centuries, Study Finds."Fueled by climate change, the drought that started in 2000 is now the driest two decades since 800 A.D." By Henry Fountain, *NY Times,* Feb. 14, 2022 https://www.nytimes.com/2022/02/14/climate/western-drought-megadrought.html

[4] "In California, rights to water exceed the supply," by George Skelton, *LA Times Capitol Journal:,* April 12, 2015 https://www.latimes.com/local/politics/la-me-cap-drought-water-20150413-column.html

Ind 775-7

V. Greenhouse Gas emissions underestimated. Rise Gold acknowledges mining operations will be emitting a huge amount - 9000 metric tons per year – but this does account the additional 4000 related to cement manufacturing, that would be well over the 10,000 metric ton significance threshold.

Ind 775-8

VI. Skewing of Data: Omitted from the report is 1) a complete scientific analysis of the clean-up of the Centennial Industrial Site (CIS), construed as a "separate," but actually an integral part of the mine-reopening project;; and 2) In the Transportation section (pp.: 903-906) the VMTs from heavy trucks, is excluded, as it was not strictly "required". (This is a loophole big enough to drive 118 heavily laden trucks—236 roundtrips—through a day for 80 years.) This leads to underestimates in the negative biological, traffic and noise impacts. Regarding the Centennial Industrial Site (CIS) there is great inconsistency and confusion generated by referring to the clean up there as "Voluntary" (587), thus underplaying the seriousness of the pollution there as one of the nation's top Superfund sites. The EIR repeatedly says this is the company's primary place for dumping mine rock (e.g. 4.3-50, 4.3-11, 4.3-55, 4.3-19) and bases various scientific analyses and calculations upon this "anticipated" chronology (104, 175, 767) when in fact Rise Gold has delayed beginning the clean-up at CIS. These two elements need to be included to get a truly accurate assessment of environmental impacts.

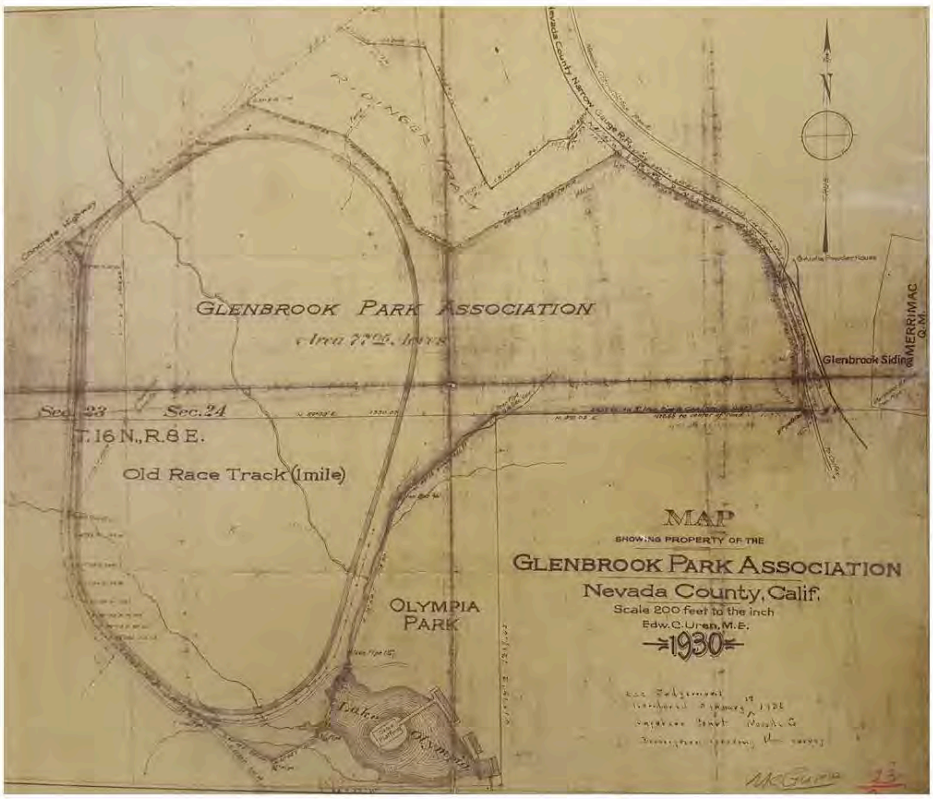
Ind 775-9

Part 2: A historical-cultural perspective. From a historical-cultural perspective, the draft EIR and the project documents are seriously deficient, specifically in Section 4.5 of the report (Cultural and Tribal Resources). On page 1028 [Section 6.3], the report claims that quantitative and in some cases qualitative evidence has been consulted for each impact, but this is a gross distortion: Rise Gold and its consultants wants to make the entire problem quantitative (and presumably fixable) while ignoring the qualitative effects on the region.

Omission: County History, Culture, and Native Americans: The Impacted Area as a Major County Transportation Hub: These are are significant omissions: 1) Two and possibly three Nisenan settlements were in the impact area: Yol si an, Dam im luk, and Si po ny, the last had a large roundhouse and graveyard.[5] These sites were recorded in 1928 by anthropologist Hugh Littlejohn from information acquired from Nevada City and Colfax Indian consultants. Bedrock

[5] Hugh W. Littlejohn field notes on Southern Maidu (Nisenan), 1928, p. 39. Online Archive of California; see also Shelley Covert's recent slide presentation for the Bear Yuba Land Trust.

mortars are located at the corner of Plaza and Sutton within the impact area. 2) There is no



mention of Lake Olympia or the Glenbrook Racetrack, both located in the Glenbrook Basin.

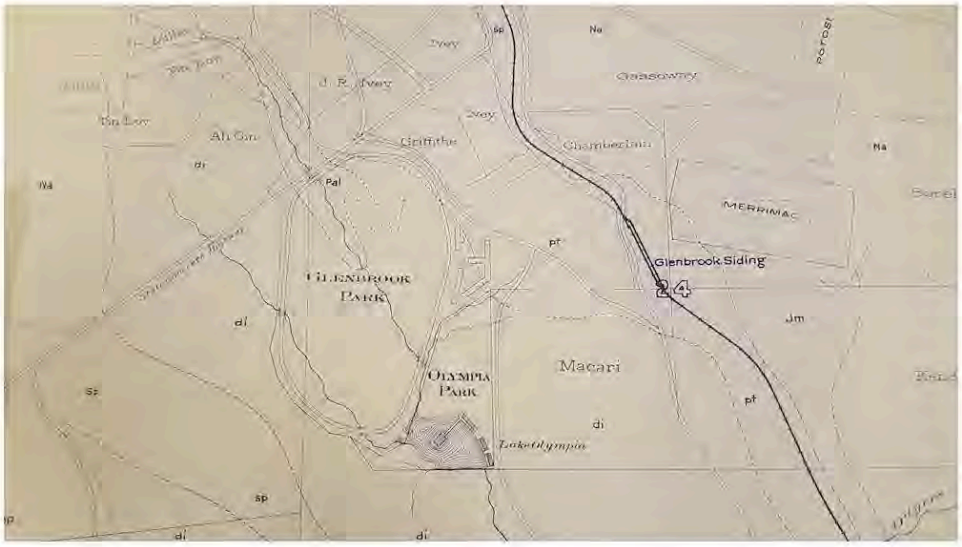
Map 1 (above, dated 1930) and Map 2 (below, dated 1924)[6] show the location of the race track and Lake Olympia (the last in the vicinity of the cinema at the junction of Plaza and Sutton). The Glenbrook Basin was registered as an important county landmark[7] in 1993, NEV 93-01.

Marker No. 59 is on Sutton Way, south of Brunswick Rd, next to bus shelter in the Glenbrook Plaza parking lot. The Idaho-Maryland mine's buildings were about a mile to the south.

This is the Landmarks Commission description of this historic site:

[6] Both maps are in the Searls Library.
[7] landmark defined as a loadstar, guide, beacon in German

5 of 12



"Early In the 1850's Glenbrook Basin first became known as the site of county fairs, horse racing and other special events. When Olympia Park, located at the south end of the basin, opened in 1901, Glenbrook Basin became the recreational center of Nevada County and much of Northern California, and remained so for over fifty years. People would come to the basin by horse and buggy or later the automobile, but those wishing for a little more excitement would often use the Nevada County Traction Company's trolley, or the Nevada County Narrow Gauge Railroad. The large grandstands of the three-quarter-mile racetrack stood near the junction of present Brunswick Road and Sutton Way. Trotting, pacing, and running horse races were held at the track, and motor car races began in 1913. The racetrack was one of the first electrically lighted racetracks in the state. A dam was constructed just northeast of the existing electrical substation to form Lake Olympia. The lake soon became one of the Basin's main attractions. Located in the center of Lake Olympia was an island with a pavilion which had a coil-spring-mounted dance floor that swayed with the rhythm of the dancers' feet. There was swimming, boating and fishing in Lake Olympia, and during some winters there was ice skating. There were boats and bathing suits for rent, and the park contained a bathhouse, a roller skating rink, and a bar. Many a romance blossomed on the lake during an evening boat ride under the stars. Families rented cabins and picnicked in the shade of the large pine trees along the shores of Lake Olympia. Olympia Park was the site of high school commencements, football and baseball games, and special events such as fat ladies' races and freckled-face children contests. The annual miners' picnics were held at the park with mucking and drilling contests, tug-of-wars and Cornish wrestling, as refreshments of various kinds flowed freely. Olympia Park fell into disrepair in the 1950s and ceased operation in 1958. **Glenbrook Basin,** once the recreational center for Nevada County, has **developed into one of the county's main centers of commerce** in supplying various types of

shopping, restaurants, services and recreation for the residents and visitors of Nevada County."[8]

Much abundant documentation exists for the cultural and historical importance of Glenbrook Basin as a recreational zone from 1850s to 1950s (See appendix 1).

A poorly planned hub: Subsequent to the closure of the Idaha-Maryland mine after World War I, Basin also ceased to be a recreational center. The basin was rezoned to promote light industry and commerce to promote economic growth. The 49/20 freeway came through in the 1960s when funds for highway improvement came through, bisecting the basin north/south as Brunswick Road had done a century before west/east. Lamentably, the automobile brought an end to the County's exceptionally-efficient and integrated mass transit system. As early as 1971, the poor planning of the area was acknowledged as "development gone awry." In fact, there had been no master plan, and one bad decisions one after another was made. The Basin was a hodgepodge of architectural styles, fast food joints, already facing traffic congestion. The water courses were paved over and the hillsides carved up. Names of streets and shopping malls retain the history of this past era, and there are some physical reminders as well, for example, some of the original tourist cabins along the Nevada City Highway, As one descends from Main Street to Sutton on Dorsey, the exhilerating, sweeping road curve follows the hoof-print of the defunct racetrack. Because of its **centrality in the County,** it nonetheless emerged as "Nevada County's most vital commercial area"[9] by the early 1990s.

Reopening the Idaho-Maryland will add yet another layer of damage to an already over-crowded badly planned road system, burdening it with bad air and heavy truck traffic. At the very least, as a mitigation Rise Gold should be required to pay for redesigning the bridge spanning the freeway and onramps to the freeway along Brunswick Road to create separate lanes for heavy truck use.

Ind 775-10

Evidence and lack of evidence of Indian occupation and its mediation: The EIR correctly observes that mining destroyed the cultural landscape of what existed prior to the gold rush. There are no registered archaeological sites in the Glenbrook Basin; indeed, there would not be as neither the United Auburn people, nor the Taylorsville Tsi Akim, nor the Nevada City Rancheria has jurisdiction in this area. The Rancheria has no legal standing as it is not federally-recognized and therefore had no voice in demanding or monitoring any archaeological project mandated under CEQA. The fact that there may be village sites, one with a graveyard, advises an abundance of caution. The EIR states (p. 6-26) that "the implementation of the proposed project could result in a **significant but mitigatable impact to unknown** archaeological resources and Tribal Cultural Resources." This is because disturbance of Central Hill Nisenan archaeological sites during construction is possible. The mitigation for such an eventuality is to follow established procedures by bringing in an archaeologist as consultant (4.5-2 and 4.6 ff; pp. 524-527). **This mitigation is inadequate.** How can one mitigate an unknown? The Native American Heritage Commission's Sacred Lands file preserves the record of only a tiny percentage of the places sacred to Native Californians. Heavy machinery used in construction and mining would obliterate any traces of artifacts or bones. **A mitigation by Rise Gold should**

[8] Excerpted from: David Comstock and Bernard Zimmerman. "Exploring Nevada County." Apple Books. "https://nevadacountylandmarks.files.wordpress.com/2017/05/glenbrook-basin.pdf

[9] *The Union* Nov. 29, 1991, p. 1.

include a full archaeological exploration and accompanying CRM (Cultural Resource Management Report with Native monitors). There should be sample testing at several places, especially in construction areas, prior to the project beginning. At the very least, , the area which has known bedrock mortars in the vicinity of Lake Olympia should be thoroughly investigated by professional archaeologists. This would serve the double-purpose of discovering possible remains from the Lake Olympia recreational site: foundations for buildings, etc.

Geo-physical and hydrological evidence suggest conditions were highly favorable for Indian village site(s) in the Glenbrook Basin. This is flat valley (first used by settlers for dairying) fed by numerous springs and creeks entering the basin from both the west and the east hillsides, thus creating meadows where a diversity of wildlife flourished, ideal for Nisenan seasonal and semi-permanent camp sites.[10] The first mention of the Glenbrook Basin in the historical early 1850s was wrestling and racing events, consistent with popular entertainments drawing miners and Indians as participants, such as those documented at Storm's Ranch in present-day Chicago Park and Bouvyer's Ranch on Deer Creek in 1850s. A racetrack at that site dates back to the mid-1850s. A marsh in the southeastern corner of the basin is where bedrock mortars have been identified.

Ind 775-11

Analysis: Rattling the Bones of Our Elders/Omitting County Culture and History as Irrelevant. Since there are few if any no-above ground physical remains, the point seems moot.[11] However, 1) Glenbrook Basin is a very significant place in Nevada County history, arguably the site of Nevada County's most glorious era from the 1880s to WWII when public transportation was king and environmentally-friendly: the electric tram and the narow gauge railroad linked Colfax, Nevada City, and Grass Valley. 2) More to the point: the Glenbrook Basin has always been a central place dating far back into pre-histoy. Historically, it is a hub of transportation, a major artery for Nevada County. The draft EIR report's failure to acknowledge our history and current needs—the importance of the basin for travel and trade, for residential occupation, and for housing our elderly— demonstrates an insensitive and callous indifference —or deliberate obfuscation —that is highly objectionable, and should not be allowed to pass withou comment. These omissions are deserving to note:

Ind 775-12

- No mention is made of the nursing homes and assisted living areas concentrated along Dorsey/Sutton: Atria, Spring Hill Manor, the Golden Empire, some of whom still drive to or walk or drive wheelchairs on newly installed sidewalks to Brunswick Basin shops. A demographic analysis of the impact area should have been included the dense concentration of the elderly here. The 2570 acre area in the Glenbrook Basin whose 73 miles of underground tunnels will be worked is an area where some of the most vulnerable County residents are concentrated: the homeless, and poorer, older, and ailing persons. A rise in ambient noise and light, seismic vibrations from explosions, construction and truck traffic, 16 hours a day, is inhumane.

[10] Geohub aAs defined by archaeologist Hank Meals, A meeting and living place based upon favorable topography where trails converge, connecting watersheds and ridges and offering access to territories of many groups," (Hank Meals). Places of abundant resources, adjacent to springs and/or wetlands favorable for trade, ceremonial events, and social transactions. See glossary, *Nevada City Nisenan.*

[11] but all that remained of I-M was a silo and a lot of mining pollution at CIP, yet it was on the Register of Historical Places.

- The tangible impacts to those above the tunnel area has been consistently underestimated.
- What the report fails to mention is that the reopened mine will do so much damage to a prosperous, stable, and high-functioning with light industry, businesses, and homes. Rural residents depend on the varied services here, e.g. banks, Verizon, well service, pharmacies, etc..
- Anyone that travels on Brunswick Road from the freeway to 174 knows how dangerous it already is and that it is far worse in bad weather. Imagine how intimidating it will be for the elders of our community to have to brave 14-ton trucks, some with explosives, when they venture out to shop or buy other supplies. Traffic accidents are inevitable.

Privileging the mining history in Section 4.5 of the report creates an illusion of continuity and disguises the profoundly aberrant nature of the proposal to reopening the I-M gold mine. We are in a post-industrial historic period. We are still remediating the damage to Native people and to the environment from the last epoch of mining. What is obvious to county residents is blithely swept aside in the report: the impact zone **at an intersection of 49/20 and the Brunswick Road to 174 to Colfax** is **a transformation hub** This is a "**central**" place on our landscape. Anyone who lives here knows the area is already congested and poorly planned, that Brunswick Road is dangerous, especially so in winter, and air quality already marginal and downright unhealthy during the fire season. A decline in property values is inevitable, especially for homes on Bennett Street and over the tunneling area. Property owners in this impact area were told by realtors as required by law that they were buying where underground mining rights were still active, but in a zone which banned heavy industry.. The residents of this area are the "new Indians" as history repeats itself. Homeowners, renters, and business owners—promised one thing—can continue to work and live in the mining area, but only at the cost of the destruction of their tranquility and the poisoning of lifeforms and/or total destruction of habit. No point in expecting or demanding compensation for losses; this is a one-way deal.

Ind 775-13

Conclusion: "Wherefore the future?" Rise Gold plays a double game, saying on the one hand, quality of life issues are "intangible," unmeasurable, and therefore unscientific and at same time the report claims brazenly that qualitative evidence has been incorporated for each impact. This is an untrue statement.[12] What we see here is a very slick strategy to "control the narrative" and thereby exclude information from the report that does not support their project about the how mining would ruin the peace,and quiet of rural life in this County.

1. **A Sustainable Future or Years of Seige?** What sureties/guarantees, permits, inspections could offset real as well as potential negative impacts and risks? The draft EIR attempts to apply all manner of technical fixes in service of corporate profit. This is one where we march forward into the past by attempting to reimpose an archaic industrial past on a post-industrial present. Nevada County is better than that. Over the last half-century, governmental laws and policies direct us towards better environmental practices: stewardship, conservation, checking the worst mistakes of the past, and implementation of technologies that reduce waste. We have mandates
    - to reduce automobile usage and greenhouse gas emissions

Ind 775-14

[12] 1 On page 1028 [Section 6.3], the report states that quantitative and in some cases qualitative evidence has been consulted for each impact.

- to encourage bicycle use (872, 976) and pedestrian traffic
- to reduce our electricity consumption and water consumption
- to improve the health of our forests
- to improve aesthetics by imposing building codes
- to clean up polluted areas and cease poisoning our rivers and creeks.

Approval of the Rise Gold's mining operations would require a number of code changes, one allowing unsightly, post-apocalyptic, 7-story high piles of mine rock, another returning Glenbrook Basin to an industrial rezoning. While engaging in stone-walling denial that degradation of the environment is "significant," the report shows degradation on multiple fronts. To rezone the Basin now, would be a betrayal to homeowners and just cause for litigation.[13] Approving the mine is going in the wrong direction. Nevada County Board of Supervisors should be leading us to a better future, not a worse one. We have a beautiful landscape, a growing population, and booming tourist industry. Why not show some character and vision, and put the mass back into transit, and make Nevada County a pioneer in implementing environmentally-friendly technologies? It was quite alarming to hear at the public hearing last Thursday at the Rood Center that Rise Gold 's use of electric power would gobble up most of the hard-won gains of electricity conservation. Consumers should not be asked to conserve so that foreign investors can profit. Economic benefits to County residents are chimerical; this propaganda should be exposed for what it is. Far more jobs and County property taxes will be created by projects that are approved or are reasonably foreseeable in the next five years (4.12-35, 4.12-43; pp. 886. 899)

Ind 775-15

Rise Gold, as many have pointed out, is not a reliable partner, and Ben Mossman is not credible. Canadian mining companies have a notorious record of making false promises and leaving environmental messes off-shore and within California itself in recent years,.[14] The Canadian Sonora Mining Company, for example, skipped town and left the taxpayers of California with a $30 million dollar clean up at the Jamestown Mine. Rise Gold has shown a willingness to make mitigations in Nevada County, but only when it is pressed to do so. In the course of this review process, some critics have suggested Rise Gold be required to put up sizable amounts of money to cover costs to individual well-owners or to the County. water issues/mining/region5 success stories/ia More numerous and regular and frequent site inspections or monitoring by objective, third parties could be required. I see these as ineffectual. **Could there ever be enough monitoring to ensure pollutants weren't entering the air or water.? How could we be exempt from freak accidents or meteorological events like windstorms or floods?** Realistically, as Robert Hubbard of the CEA and others have pointed out, once the mine is up and in operation and

[13] Tony Lauria, *Union*, March 7, 2022, A4; cf. https://www.waterboards.ca.gov/rwqcb5/
[14] For example, Canadian Mining in Latin America: Exploitation, Inconsistency, and Neglect June 11, 2014 COHABy Malavika Krishnan athttps://www.coha.org/canadian-mining-in-latin-america-exploitation-inconsistency-and-neglect/#:~:text=Canadian%20firms%20such%20as%20Barrick,the%20development%20stage%20%5B3%5D.

making profits for its non-resident investors, Rise Gold would simply pay penalties rather than cease operations and correct the violations. Worst comes to worse, tax payers are left with clean-up costs as they were at Jamestown mine. Personally, I would like to see test runs, as well as more scientific study. 14-ton trucks should run up and down Whispering Pines and Brunswick 16-hours a day to see if anyone notices increased noise or traffic congestion. As a sign of trustfulness and commitment to the well-being of our community, Rise Gold should first clean up the Centennial Industrial Site to community members satisfaction; then and only then will we consider reopening the Idaho-Maryland mine.

The real core of the problem, however, is this: **Rise Gold has put us on the defensive in our own land. Our safety depend on regular monitoring, honesty, and proper enforcement.** Hundreds and hundreds of hours by private citizens, environmental groups, and county government employees have already been expended to protect the status quo. (I have put in more than 200 hours working on this existential threat.), If approved, thousands more hours will be required to minimize the environmental degradation to come and to avert potentially catastrophic destruction. Why should we allow Rise Gold to put us in this unpleasant and unending role? A vastly expanded government bureaucracy would be necessary to serve as a watchdog over mining operations of this scale (the largest operating gold mine in the nation?!) and to enforce penalties. To paraphrase political analyst P.J. O'Rourke: Government can't be tasked to do everything and expect it to be well done.[15]

Do we really want to enlarge our rural county government to serve as a counter-balance to Big Business? Is it really a good use of our resources to have our bureaucracy expand to do such things as send a wildlife biologist (4.34-36) out to rescue a single western pond turtle? Far better not to endanger it and its/her/his fellows in the first place. The County would have to engage lawyers to force Rise Gold to pay for this alleged violation of its contractual agreements, and this would go on and on and on. With the enlargement of our chronically-underfunded County bureaucracy to counter a wealthy business enterprise comes the increased opportunities for bribery and corruption. The County government may be seduced by the prospect of income for the County government: jobs-creation and power expansion from huge permitting fees. Taking a lesson from history, the Bureau of Indian Affairs (or Office of Indian Affairs) was originally created within the Department of the Interior with good intentions: to protect, serve, and uplift the Native people. As time passed, the Bureau's size and budget grew until 50 % of its budget was expended to pay the salaries of non-white employees, and an unfortunately large number of government employees engaged in graft and skimming, exploiting the very people they were supposed to serve. If approved, whose interests will the County of Nevada be serving over the course of the next 80 years: the mine owners, or the people who are its first responsibility: County residents?

CEQA was intended to protect the environment against environmental polluters. Rise Gold has misused a process designed to protect human beings, by turning the EIR into a document that dismisses our quality of life as "insignificant" as well as our culture and our history. The correct take-away from this report is: **"the project's incremental contributions to the significant cumulative impact is cumulatively considerable." (4.0-3)**

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[15] Quote from *Parliament of Whores*.

Respectfully,

Tanis C. Thorne
14504 Hobnob Way, Nevada City

Appendix: Glenbrook Basin (aka Brunswick Basin)[16]

In the mid-1880s, county boosters advocated for the creation of a county fair, and Glenbrook was chosen because of its central location by a 6-1 vote. (*Nevada County Daily Transcript*, April 4, 1885).People could walk there from both Grass Valley and Nevada City. it was a prime candidate because of its existing racetrack, a staple of county fairs at that time. The goal was to create one of the best race tracks and fairgrounds in the western United States; it was"the biggest racetrack in California" according to Vince Seck . The opening was attended by Leland Stanford and California Governor George Stoneman, General Francis Amasa Walker (president of MIT) and Stephen Gage of the Central Pacific Rail Road. 500 persons attended the ball. A dedicatory speech was delivered at the Nevada Theatre by Aaron Sargent. In 1887, the race track became world-class electrification, likely having the distinction of being the first illuminated sporting event at night on Sept. 8, 1887. In 1889, a brook feeding the marsh was damned to create the 2-acre, artificial Lake Olympia (near Plaza Road and Sutton Way).

In the early 1900s, Lake Olympia and Glenbrook Race Track were at the first peak of their popularity. In August 1901, the Nevada County Traction Company, the electric rail line linking Grass Valley and Nevada City, was completed and the first electric car from Grass Valley arrived at Glenbrook. The Traction Company had 4 streetcars running between Pine and Broad Streets in Nevada City and Boston Ravine in Grass Valley (departing hourly from NC) and , passing through Glenbrook Basin near where Olympia Way meets Brunswick Road today. The fare was 15 cents each way. The Traction Co had a successful 25 year electric streetcar line. Coaches were 32 feet long holding 32 passengers inside and 12 outside. On big events, cars left at 15 minute intervals. The opening of the was electric road was dedicated with concerts, reception, parades, dances, the ringing of bells, and mine excursions;

Also in 1901, Lake Olympia had been developed as 15 acre park with a dance floor and pavilion on an artificial island, swimming, canoeing, high diving, summer tourist cabins, confectionery, bar, and bath houses. Teddy Roosevelt visited in 1903. Lake Olympia was reputedly the "most popular spot in Nevada County", a "social and recreational center of Grass Valley and Nevada City. "It was a little piece of paradise, like a 'fun world' today," said local historian Ron Sturgell. "Lake Olympia will always live on in our memories."

In the first half of the 20th century, Glenbrook basin remained the premier location for recreation in Nevada County; its dance hall was the most popular in the county, thanks to the excellent mass transit system in place. It was cheaply and easily accessed by county residents. Residents (miners, ranchers, orchardists) could and did travel from Chicago Park on the narrow gauge railroad to recreate, picnic, tennis, swim, listen to live music and dance many nights a week. Race cars replaced horses at the racetrack, attracting large crowds and competitors from across the western U.S. In the 1920s and 1930s, Big Bands regularly made appearances at Lake Olympia. Lionel Hampton and other big-band musicians provided entertainment on weekends. "There was always good music there," said Helen Williams. Williams grandfather helped build

[16] Brunswick Road bisecting the Glenbrook Racetrack carried traffic to the Brunswick Mine;

the spring floor. "the floor would really bounce," she said. Soldiers stationed at Beal Air Force Base came to dance at Lake Olympia, a popular place for rest and recuperation during World War II.

Thanks to its productive gold mines and low unemployment, Nevada County enjoyed prosperity and entertainment at the Glenbrook Basin while others in the nation struggled. Nevada County residents swam and danced at Lake Olympia. Adjacent to the Idaho-Maryland mine, Glenbrook's racetrack and Lake Olympia were the two symbiotic sides of the Nevada County life: the economic and the social. Each was served by the remarkably efficient and environmentally-friend infrastructure of electric street cars and railways.

Sources:

The major secondary sources on Glenbrook Park are Juanita Kennedy Brown, *A Tale of Two Cities and a Train* (1987) and David Allan Comstock, *Greenbacks and Copperheads, 1859-1869* (1995). Most of the information is drawn from Union newspaper articles; see for example, a 3 part series Nov. 28, 29, 30, 1991. Some clippings are preserved in the Landmark Commission file on Glenbrook Basin, Searls Library (NCHS). Dozens of photographs of the the racetrack and Lake Olympia are preserved there as well; others are found in the Dorsey Collection, Bancroft Library, Berkeley, California. Vince Seck, whose family were the last owners of Lake Olympia has a good collection of photos and newspaper clippings.

INDIVIDUAL LETTER 775: TANIS THORNE (1)

Response to Comment Ind 775-1

This is an introductory comment and does not provide a specific comment on an environmental issue associated with the project. Please see Master Response 1 - Non-EIR and Administrative Issues.

Response to Comment Ind 775-2

This is an introductory comment and broadly outlines the commenter's disagreement with conclusions identified in the DEIR. The commenter does not provide specific reasons why the environmental analysis was deficient but rather states disagreement with its overall conclusion. Please see Master Response 1 - Non-EIR and Administrative Issues.

Response to Comment Ind 775-3

The commenter asserts there is insufficient research on wind patterns in the DEIR. The dispersion model in the Health Risk Assessment used the most appropriate available data (including wind) for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA**.**

The commenter describes a huge drawdown on water in a mega drought and asserts that using water to control dust is problematic due to the drought. The impacts from groundwater drawdown from mine dewatering have been analyzed in the DEIR and are less than significant after mitigation. Water use for dust suppression was also examined in the DEIR, and impacts related to that use were considered less than significant. (DEIR p. 4.11-36; Appendix N.) As stated on page 4.8-12 of the DEIR, based on the lack of changes in the individual well hydrographs between wet and dry climatic cycles, the amount of recharge appears to be consistent from year to year and is not affected substantially by drought or wet cycles. The commenter describes a grave severity of air-borne pollutants. The health impact of constituents in dust particles produced by various project activities has been analyzed in the DEIR and is less than significant after mitigation measures. The Health Risk Assessment is based on conservative assumptions. Please see Master Response 22 – Conservatism of Asbestos Assumptions. Nevertheless, the EIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. The minimum requirements of the ADMP are provided in the DEIR. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. With regard to health impacts of metals in dust from the mine, these impacts were analyzed in a Health Risk Assessment using conservative assumptions, which reached the conclusion that acute and chronic health impacts would be less than significant under NSAQMD standards. (see Master Response 20 – Conservatism of Metals Assumptions).

Response to Comment Ind 775-4

The commenter asks how often mine rock will be tested for dangerous contaminants, specifically asbestos. As described in DEIR section 4.3.4 (page 4.3-61) and Appendix E.2, Asbestos Serpentine and Ultramafic Rock (ASUR) Plan, two methods of asbestos testing are required. PLM testing is required to comply with the Asbestos ATCM. TEM testing is done to verify that mine planning is effectively minimizing the potential for public exposure to airborne asbestos from the project. The amount of sampling for asbestos, segregation and management of materials is

described in Appendix E.2 of the DEIR. Air monitoring will be performed and paid for by the applicant in accordance with the approved Asbestos Dust Mitigation Plan (ADMP). Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. The ASUR Plan will be an enforceable condition of approval, and components of the plan will become part of the approved ADMP at the NSAQMD's discretion.

The commenter states the DEIR does not address long-term leakage/wind-borne contamination from engineered fill piles. As stated in the DEIR and reclamation plan (Appendix C of the DEIR), fill slopes and the final pad will be revegetated which would minimize long-term wind erosion on the engineered fill piles. As described in Chapter 3 of the DEIR, the engineered fill placement creates large flat areas suitable for potential future industrial buildings and not 165 tall "towers" as described by the commenter. Nevertheless, the DEIR has concluded the project would have a significant and unavoidable aesthetics impact, in part due to the visibility of the engineered fill piles.

Response to Comment Ind 775-5

The commenter states that more pre-testing and monitoring by 3rd parties for the mine water discharge to protect downstream lifeforms and requests more information on contaminants in water, water treatment, and chemical analysis prior to discharge to South Fork Wolf Creek. The mine water that will be discharged to South Fork Wolf Creek will be treated prior to discharge to ensure that it meets water quality standards set by the Central Valley Regional Water Quality Control Board; therefore, the project has a less than significant impact to water quality in the creek after mitigation. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

The commenter states that more precautionary measures are required in the event of storm events and extreme flood events to prevent overflow of untreated mine water to South Fork Wolf Creek. A Preliminary Drainage Analysis (PDA) (Nevada City Engineering, 2019) was prepared and included as DEIR Appendix K.5. As described in DEIR section 4.8.4, the PDA was peer reviewed by the County and potential impacts were analyzed in Impact 4.8-3. As stated in the conclusion to Impact 4.8-3:

> "The drainage analyses discussed above conclude that the project would not significantly alter the drainage patterns of the sites in a manner which would result in substantial erosion or siltation on- or off-site, nor substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, nor create or contribute to runoff water which would exceed the capacity of existing stormwater drainage systems, nor impede or redirect flood flows." (DEIR page 4.8-75)

As stated in Appendix K.5 of the DEIR, the drainage calculations and detention basins are specifically designed to respond to the drainage requirements of the County of Nevada. The Nevada County drainage requirements indicate that new storm drain systems and channels shall be designed to convey the 10- and 100-year, 24-hour storm event. Section 4.5 of Appendix K.2 discusses the 6.4-acre catchment area where precipitation would inflow into the water treatment pond and confirms that the designed freeboard volume is more than adequate to retain the runoff from a 100-year storm event.

The commenter states that regular monitoring of mine water discharge should be done by 3rd parties such as Wolf Creek Alliance and paid for by the applicant. The Central Valley Regional

Water Quality Control Board is the regulatory agency responsible for the regulations pertaining to the mine water discharge and the applicant would conduct monitoring in accordance with the approved Notice of Applicability. The Central Valley Regional Water Quality Control Board would also have enforcement authority over the mine operator for any violations. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 775-6

The commenter asserts that there is insufficient water supply for the project due to drought conditions. The County EIR consultant prepared a water supply assessment (WSA) for the proposed project (see Appendix N) which was analyzed in DEIR Chapter 4.11. The WSA evaluated the adequacy of NID's total projected water supplies, including existing water supplies and future planned water supplies, to meet the existing and projected future water demands, including those future water demands associated with the proposed project, under all hydrologic conditions (Normal Years, Single Dry Years, and Multiple Dry Years) (see DEIR page 4.11-8). The WSA concluded that NID has sufficient water supply to meet the project's demand. DEIR Impact 4.11-7 analyzed whether sufficient water supply exists to serve the project for the foreseeable future and under the previously mentioned conditions. This impact analysis concluded sufficient water supplies would be available to serve the proposed project, as well as existing and reasonably foreseeable future development during normal, dry, and multiple dry years. As a result, this was considered a less than significant impact. In addition, the Nevada Irrigation District has approved the project's water supply assessment and is an expert agency in water supply.

NID has also established contingency measures during drought years. Regarding NID's Water Shortage Contingency Plan, as described in NID's 2020 UWMP (Chapter 6 Drought Plan) and the WSA (Section 6.2 Additional Planned Future Potable Water Supplies), there are numerous management and operational efforts available to NID to address potential supply shortfalls during drought periods. Demand reductions, carryover storage strategies, system operational strategies, supplemental supplies, increased storage, and others are all options available to NID in the event of a water shortage condition. NID will evaluate each specific shortage condition and select the appropriate response action(s) for implementation. If supplies become extremely critical requiring implementation of Stage 6 of NID's Water Shortage Contingency Plan, drinking water supplies to NID's treated water and municipal water customers may be reduced to health and safety use of water only, but would not be cut off.

NID is also in the early stages of a long-term visioning and planning effort to better understand potential future conditions and needs in response to climate change, and identify management and operational practices to meet those needs. The process, Plan for Water, will identify optional water management practices as triggering points in supply, demand, regulatory, legal, and other events are reached. These practices may include supply projects, demand management efforts, policy changes, and others. As the Plan for Water process is developing mitigation measures for drought resiliency, NID will continue to implement its current drought and water shortage contingency efforts as described in NID's 2020 UWMP.

Water used for dust suppression at the Centennial site may be purchased from NID and the project would be subject to the same water restrictions as any other NID customer.

Contrary to the commenter's assertion that the EmGold analysis reached a significantly different conclusion, previous hydrogeologic assessments conducted for Emgold proposals, have come to a similar conclusion as the current analysis despite the use of simplistic analytic solutions. Please see Master Response 13 – Historic Hydrogeologic Assessments.

Response to Comment Ind 775-7

The commenter suggests that GHGs associated with the manufacture of cement should have been included in the DEIR. This comment pertains to a "lifecycle" analysis, which is not required under CEQA. Please see Master Response 26 – Life Cycle GHG emissions.

Response to Comment Ind 775-8

The commenter states the Centennial Industrial Site Clean-Up project should be included in the analysis of the Idaho-Maryland Mine project. Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA. The commenter states that Rise has delayed the cleanup of the Centennial site; however, this is not accurate. Rise is working with DTSC to enter into a voluntary cleanup agreement and is still awaiting DTSC approval to enter into that agreement and begin cleanup. No steps have been taken by Rise to delay cleanup; rather Rise has taken affirmative steps to initiate cleanup at its own expense, of a site that has historic pollution issues not caused by Rise.

The commenter also makes an assertion that because Vehicle Miles Travelled (VMT) was not used to assess potential project impacts, the DEIR underestimated potential impacts, including biology, traffic and noise. The commenter correctly states heavy truck trips used to transport fill to the Centennial site and surrounding construction market were excluded from the VMT analysis. As explained in detail in DEIR section 4.12.4, subsection Project Vehicle Miles Traveled Analysis (see pages 4.12-52 – 55), the VMT legislation, Office of Planning and Research (OPR) guidance, and CEQA guidelines section 16064.4 was based on reduction of greenhouse gases caused by automobiles and light trucks. Nothing in the legislation, OPR guidance documents, CEQA Guidelines, or County traffic analysis guidelines requires heavy vehicle truck trips be included in the VMT analysis. Rather, OPR guidance documents suggest that heavy trucks should not be included in VMT analysis for CEQA purposes. Contrary to the commenter's assertion, heavy truck traffic was included in the noise analysis. The commenter does not explain its comment that heavy trucks would result in biological impacts.

Response to Comment Ind 775-9

The commenter provides additional historical information regarding the region near the project site called Glenbrook Basin. Glenbrook Basin is outside the project footprint and would not be subject to project related surface disturbance and impacts. As noted by the commenter, this area is already heavily developed and is now "one of the County's main centers of commerce."

Response to Comment Ind 775-10

The commenter summarizes DEIR Cultural Resources Impact 4.5-2 and disagrees with the conclusion and mitigation measure identified. As explained in this section, a site-specific cultural resources survey was conducted by a qualified archeologist meeting the Secretary of the Interior's Professional Qualification Standards. This included outreach to the Native American Heritage Commission, surrounding Native American tribes and historical entities, and the Nevada County Landmark Commission (see DEIR pages 4.5-19 – 21). The analysis, conclusion, and mitigation measure in Impact 4.5-2 was based on this extensive site-specific analysis and broad outreach and reflects the judgment of professional experts in the field and the best available information.

Response to Comment Ind 775-11

Please see Response to Comment 775-9 above regarding Glenbrook Basin.

Response to Comment Ind 775-12

Please see Response to Comment 775-9 above regarding Glenbrook Basin.

The commenter also raises general concerns regarding potential ambient noise increases, light, vibrations, and truck traffic within the Glenbrook Basin. The commenter does not provide any specific comments regarding deficiency of the analysis, disagreement with conclusions, or additional potential mitigation measures.

Potential ambient noise increases from proposed project activities and traffic was analyzed in DEIR Chapter 4.10, Impacts 4.10-2 and 4.10-3. The impacts were found potentially significant and mitigation measures were identified, including prohibiting the use of Jake brakes and development and implementation of an ongoing noise monitoring program. These noise impacts were considered less than significant after mitigation.

Aesthetics impacts, including potential for additional light and glare, were analyzed in DEIR Chapter 4.1, Impacts 4.1-3 and 4.1-5. These impacts were considered less than significant.

Ground-borne vibration impacts from underground mining activities were addressed in DEIR Chapter 4.10, Impact 4.10-4. The impact was found potentially significant and the DEIR identified a mitigation measure requiring the preparation and ongoing implementation of a Ground-Borne Vibration Monitoring Program. This impact was less than significant after mitigation.

Transportation impacts are evaluated in Chapter 4.12 of the DEIR. Haul routes are established for the project's heavy trucks, the majority of which do not need to be travelled to access shopping opportunities.

Response to Comment Ind 775-13

Please see Response to Comment Ind 775-9 above regarding Glenbrook Basin. Transportation impacts are addressed in Chapter 4.12 of the DEIR. It is noted that the DEIR includes the following mitigation measure, addressing truck traffic on Brunswick Road:

> *4.12-6(e)* *Prior to commencement of operations, the Project Applicant shall obtain an encroachment permit from Nevada County and install: 1) W51 "Slow Trucks" road sign along Brunswick Road, about 500 feet north of the E. Bennett Road intersection; 2) A second sign shall be installed at the applicant's expense just south of the crest of the grade, warning truck drivers of the transition in grade and presence of the downgrade Loma Rica Drive intersection.*

Regarding property value concerns, please see Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 775-14

Please see Master Response 1 - Non-EIR and Administrative Issues, and Response to Comment Agcy 8-17 regarding evidence that the project would not result in wasteful or inefficient use of energy.

Response to Comment Ind 775-15

This is a conclusory comment and does not provide a comment on an environmental issue associated with the project. Please see Master Response 1 - Non-EIR and Administrative Issues, regarding project opposition and support, and see Master Response 3 - Operator Responsibility.

Individual Letter 776

UNIVERSITY OF CALIFORNIA, IRVINE
BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO SANTA BARBARA • SANTA CRUZ

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April 6, 2022

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Av, Suite 170
Nevada City, Ca 95959

To Mr. Matt Kelley, Senior Planner:

Ind 776-1 For ease in reading, see a copy of the letter sent to you digitally on April 4, 2022.

Respectfully,

James C. Thorne, Ph.D.

Tanis C. Thorne
14504 Hobnob Way
Nevada City
959-910-5695

corrected typos and grammar, 4/5 1 of 13

April 4, 2022

Mr. Matt Kelley
Senior Planner
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950 Maidu Avenue, Suite 170
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RECEIVED
APR 04 2022
NEVADA COUNTY
PLANNING DEPARTMENT

To the Nevada County Board of Supervisors,

I write as a concerned 35-year resident of Nevada County, a retired University of California history professor (Ph.D. UCLA in U.S. History, 1987), and active member of the Nevada County Historical Society.[1] My most recent book is The Nevada City Nisenan (2022). My father resided Atria Grass Valley at 150 Sutton Way until his death in 2016. The impacted area and its various businesses and roads are very familiar to me.

Ind 776-2

Having read the **entire** EIR, **I strongly oppose reopening the Idaho-Maryland Mine.** The draft EIR is misleading in its manipulative selectivity and its omissions, creating a false impression of the relative harmlessness of the mine's dire impacts. Far more scientific research is necessary to protect the environment: the mitigations proposed are far from adequate. I respectfully offer my two part analysis of why approval is a grave mistake for this county:

Ind 776-3

Part I: Environmental/Quantitative: Of 83 identified impacts, 30 were deemed "significant" and only 3 found "unavoidable." I find the analyses of those mine opponents with scientific expertise in the community, such as the CEA, persuasive: that baseline studies on air and water are not current, groundwater models faulty, and mitigations insufficient. That County residents should be subject to **any** increase in traffic, **any** deterioration in air or water quality, or **any** dangers from potential accidents is **unacceptable**. My questions and comments are directed at my primary concerns.

Ind 776-4

I. **Insufficient research on wind patterns:** No where in this EIR is a scientific analysis of wind patterns in the impacted area. Such in-depth study is necessary given the mortal danger of windblown pollutants like asbestos dust. Rise Gold acknowledges this hazard and offers to mitigate by drawing on NID water to tamp down the dust. **Addressing one problem by creating another (a huge draw on water in a mega-drought) is not a viable solution**: it is a double environmental hit on our air and water. Given the grave severity of air-borne pollutants, Rise Gold should be required to do much more investigation and explication and mitigation than they currently offer. There are, as I understand it, two sources of airborne conta-

[1] tanisthorne.com The book includes a chapter on mining by Hank Meals.

minants: dried mud from the dewatered mine [2] and asbestos-laden mine-rock brought to the surface in stupendous volumes. I should like to know more about the process of monitoring and containing such pollutants. Finally, as a known pattern of climate warming we currently experiencing (such as the winter storm of December 2021) is increasingly erratic and intense weather events,[3] worst-case scenerios for wind events should be anticipated, not the best case scenerios anticipated in the EIR. The erection of wind barriers around the areas where mine rock at industrial sites, addresses only one small phase where such fibers could escape into the air. Rise Gold should be required to more than a "half-baked" analysis. The mitigations offered are inadequate.

Ind 776-5

II. How often will the mine rock be tested for dangerous contaminants before piled up at the industrial sites or loaded on trucks? How will asbestos-laden rock be segregated from other waste rock? How will contaminated rock be treated? Who will do the monitoriing and who will pay? Then, there is the rather serious issue, which the MEIR does not address of long-term leakage and wind-borne contamination in the "recuperated zones" of so-called "engineered" mine rock **The mitigation proposed** (as above) **which creates yet another "significant and unavoidable" aesthetic impact** —and more frighteningly a legacy of poison for our descendants—**is unacceptable**: viz. mine rock disposal creating 165-foot tall towers. (Likewise, the "solution" to disposal of mine rock exported by trucks, creates at least two "unmitagatable" impacts.)

Ind 776-6

III. Insufficient research on contaminants entering the South Fork Wolf Creek watershed. Given the danger not only to County residents and biotic environment, but potentially millions more lifeforms living downstream to the Delta and beyond, there needs to be more pre-testing, monitoring by 3rd parties and more precautionary measures in place in the event of storm events (627) Once water from the dewatered mine be brought to the surface, County residents have a right to know what contaminants are in the water, and how treated, and what the chemical analysis is prior to being released into the South Fork. New testing should be done to test water quality now. Again, worst-case scenerios should be anticipated—an extreme flood event—to prevent overflow of contaminated, untreated water from the catchment ponds into the river. The mitigations, while offering some protections against flood events (628) are inadequate (699). Rise Gold should be required to pay the Wolf Creek Alliance or other independent 3rd party for regular monitoring.

Ind 776-7

IV. Unprecedented historic drought conditions have altered conditions, requiring recalibration of the water use projections deemed "insignificant. 42,000 gpd for dust suppression for 6 years may we more than NID can spare. Already, according to Section 11.5, the demand expected

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[2] "The water coming from these mines [after dewatering] that they're dewatering is full of arsenic, manganese, iron, and other heavy metals," says the biologist Josie Crawford, the executive director of the Wolf Creek Community Alliance, another local group that opposes the mine. "It will be treated, but it needs to be treated forever." Quoted in the Atlantic, Jan. 30, 2022.

[3] "How Bad Is the Western Drought? Worst in 12 Centuries, Study Finds."Fueled by climate change, the drought that started in 2000 is now the driest two decades since 800 A.D." By Henry Fountain, *NY Times*, Feb. 14, 2022 https://www.nytimes.com/2022/02/14/climate/western-drought-megadrought.html

to exceed supply in dry years. (840) The mitigation proposed is that additional water could be supplied from the Bear River drainage has no realistic basis. California has mandated water conservation and water is over-allocated everywhere—in other words there are far more stakeholders promised water than there is water.[4] A more accurate hydrologic model is needed to address concerns about groundwater impacts for all well owners in the impacted area, whose concerns have been slighted. EmGold acknowledged the potential threat to well-owners was more serious and widespread. Rise Gold has underestimated the threat to well owners.

Ind 776-8

V. **Greenhouse Gas emissions underestimated.** Rise Gold acknowledges mining operations will be emitting a huge amount - 9000 metric tons per year – but this does account the additional 4000 metric tons per year related to cement manufacturing, that would be well over the 10,000 metric ton per year significance threshold.

Ind 776-9

VI. **Skewing of Data: Omitted** from the report is 1) a complete scientific analysis of the clean-up of the Centennial Industrial Site (CIS), construed as a "separate," but actually an integral part of the mine-reopening project;; and 2) In the Transportation section (pp.: 903-906) the VMTs from heavy trucks, is excluded, as it was not strictly "required". (This is a loophole big enough to drive 118 heavily laden trucks—236 roundtrips—through a day for 80 years.) This leads to underestimates in the negative biological, traffic and noise impacts. Regarding the Centennial Industrial Site (CIS) there is great inconsistency and confusion generated by referring to the clean up there as "Voluntary" (587), thus underplaying the seriousness of the pollution there as one of the nation's top Superfund sites. The EIR repeatedly says this is the company's primary place for dumping mine rock (e.g. 4.3-50, 4.3-11, 4.3-55, 4.3-19) and bases various scientific analyses and calculations upon this "anticipated" chronology (104, 175, 767) when in fact Rise Gold has delayed beginning the clean-up at CIS. These two elements need to be included to get a truly accurate assessment of environmental impacts.

Ind 776-10

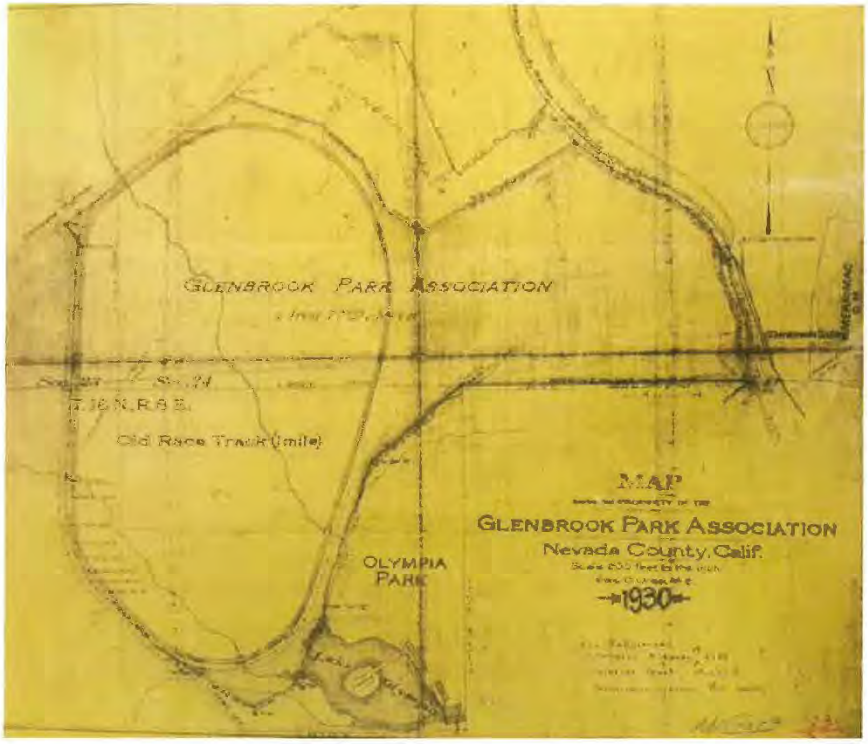
Part 2: A historical-cultural perspective. From a historical-cultural perspective, the draft EIR and the project documents are seriously deficient, specifically in Section 4.5 of the report (Cultural and Tribal Resources). On page 1028 [Section 6.3], the report claims that quantitative and in some cases qualitative evidence has been consulted for each impact, but this is a gross distortion: Rise Gold and its consultants wants to make the entire problem quantitative (and presumably fixable) while ignoring the qualitative effects on the region.

Omission: County History, Culture, and Native Americans: The Impacted Area as a Major County Transportation Hub: These are significant omissions: 1) Two and possibly three Nisenan settlements were in the impact area: Yol si an, Dam im luk, and Si po ny, the last had a large

[4] "In California, rights to water exceed the supply," by George Skelton, *LA Times Capitol Journal*:, April 12, 2015 https://www.latimes.com/local/politics/la-me-cap-drought-water-20150413-column.html

corrected typos and grammar, 4/5 4 of 13

roundhouse and graveyard.[5] These sites were recorded in 1928 by anthropologist Hugh Littlejohn from information acquired from Nevada City and Colfax Indian consultants. Bedrock mortars are located at the corner of Plaza and Sutton within the impact area.* 2) There is no mention of Lake Olympia or the Glenbrook Racetrack, both located in the Glenbrook Basin.



Map 1 (above, dated 1930) and Map 2 (below, dated 1924)[6] show the location of the race track and Lake Olympia (the last in the vicinity of the cinema at the junction of Plaza and Sutton). The Glenbrook Basin was registered as an important county landmark[7] in 1993, NEV 93-01.

[5] Hugh W. Littlejohn field notes on Southern Maidu (Nisenan), 1928, p. 39. Online Archive of California; see also Shelley Covert's recent slide presentation for the Bear Yuba Land Trust.*

[6] Both maps are in the Searls Library.

[7] landmark defined as a loadstar, guide, beacon in German

* See Exhibit A.

corrected typos and grammar, 4/5 5 of 13

Marker No. 59 is on Sutton Way, south of Brunswick Rd, next to bus shelter in the Glenbrook Plaza parking lot. The Idaho-Maryland mine's buildings were about a mile to the south.

This is the Landmarks Commission description of this historic site:

> "Early In the 1850's Glenbrook Basin first became known as the site of county fairs, horse racing and other special events. When Olympia Park, located at the south end of the basin, opened in 1901, Glenbrook Basin became the recreational center of Nevada County and much of Northern California, and remained so for over fifty years. People would come to the basin by horse and buggy or later the automobile, but those wishing for a little more excitement would often use the Nevada County Traction Company's trolley, or the Nevada County Narrow Gauge Railroad. The large grandstands of the three-quarter-mile racetrack stood near the junction of present Brunswick Road and Sutton Way. Trotting, pacing, and running horse races were held at the track, and motor car races began in 1913. The race-track was one of the first electrically lighted racetracks in the state. A dam was constructed just northeast of the existing electrical substation to form Lake Olympia. The lake soon became one of the Basin's main attractions. Located in the center of Lake Olympia was an island with a pavilion which had a coil-spring-mounted dance floor that swayed with the rhythm of the dancers' feet. There was swimming, boating and fishing in Lake Olympia, and during some winters there was ice skating. There were boats and bathing suits for rent, and the park contained a bathhouse, a roller skating rink, and a bar. Many a romance blossomed on the lake during an evening boat ride under the stars. Families rented cabins and picnicked in the shade of the large pine trees along the shores of Lake Olympia.

Olympia Park was the site of high school commencements, football and baseball games, and special events such as fat ladies' races and freckled-face children contests. The annual miners' picnics were held at the park with mucking and drilling contests, tug-of-wars and Cornish wrestling, as refreshments of various kinds flowed freely. Olympia Park fell into disrepair in the 1950s and ceased operation in 1958. **Glenbrook Basin,** once the recreational center for Nevada County, has **developed into one of the county's main centers of commerce** in supplying various types of shopping, restaurants, services and recreation for the residents and visitors of Nevada County."[8]

Much abundant documentation exists for the cultural and historical importance of Glenbrook Basin as a recreational zone from 1850s to 1950s (See appendix 1).

A poorly planned hub: Subsequent to the closure of the Idaho-Maryland mine after World War I, the basin also ceased to be a recreational center. The basin was rezoned to promote light industry and commerce to promote economic growth. The 49/20 freeway came through in the 1960s when funds for highway improvement came through, bisecting the basin north/south as Brunswick Road had done a century before west/east. Lamentably, the automobile brought an end to the County's exceptionally-efficient and integrated mass transit system. As early as 1971, the poor planning of the area was acknowledged as "development gone awry." In fact, there had been no master plan, and one bad decision after another was made. The Basin was a hodgepodge of architectural styles, fast food joints, already facing traffic congestion. The water courses were paved over and the hillsides carved up. Names of streets and shopping malls retain the history of this past era, and there are some physical reminders as well, for example, some of the original tourist cabins along the Nevada City Highway, As one descends from the freeway to Sutton on Dorsey, the exhilerating, sweeping road curve follows the hoof-print of the defunct racetrack. Because of its **centrality in the County,** it nonetheless emerged as "Nevada County's most vital commercial area"[9] by the early 1990s.

Reopening the Idaho-Maryland will add yet another layer of damage to an already overcrowded badly planned road system, burdening it with bad air and heavy truck traffic. At the very least, as a mitigation Rise Gold should be required to pay for redesigning the bridge spanning the freeway and onramps to the freeway along Brunswick Road to create separate lanes for heavy truck use.

Ind 776-11

Evidence and lack of evidence of Indian occupation and its mediation: The EIR correctly observes that mining destroyed the cultural landscape of what existed prior to the gold rush. There are no registered archaeological sites in the Glenbrook Basin; indeed, there would not be as neither the United Auburn people, nor the Taylorsville Tsi Akim, nor the Nevada City Rancheria has jurisdiction in this area. The Rancheria has no legal standing as it is not federally-

[8] Excerpted from: David Comstock and Bernard Zimmerman. "Exploring Nevada County," Apple Books. "https://nevadacountylandmarks.files.wordpress.com/2017/05/glenbrook-basin.pdf

[9] *The Union* Nov. 29, 1991, p. 1.

Exhibit A Shelly Court presentation 2022

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Size: ~182 KB

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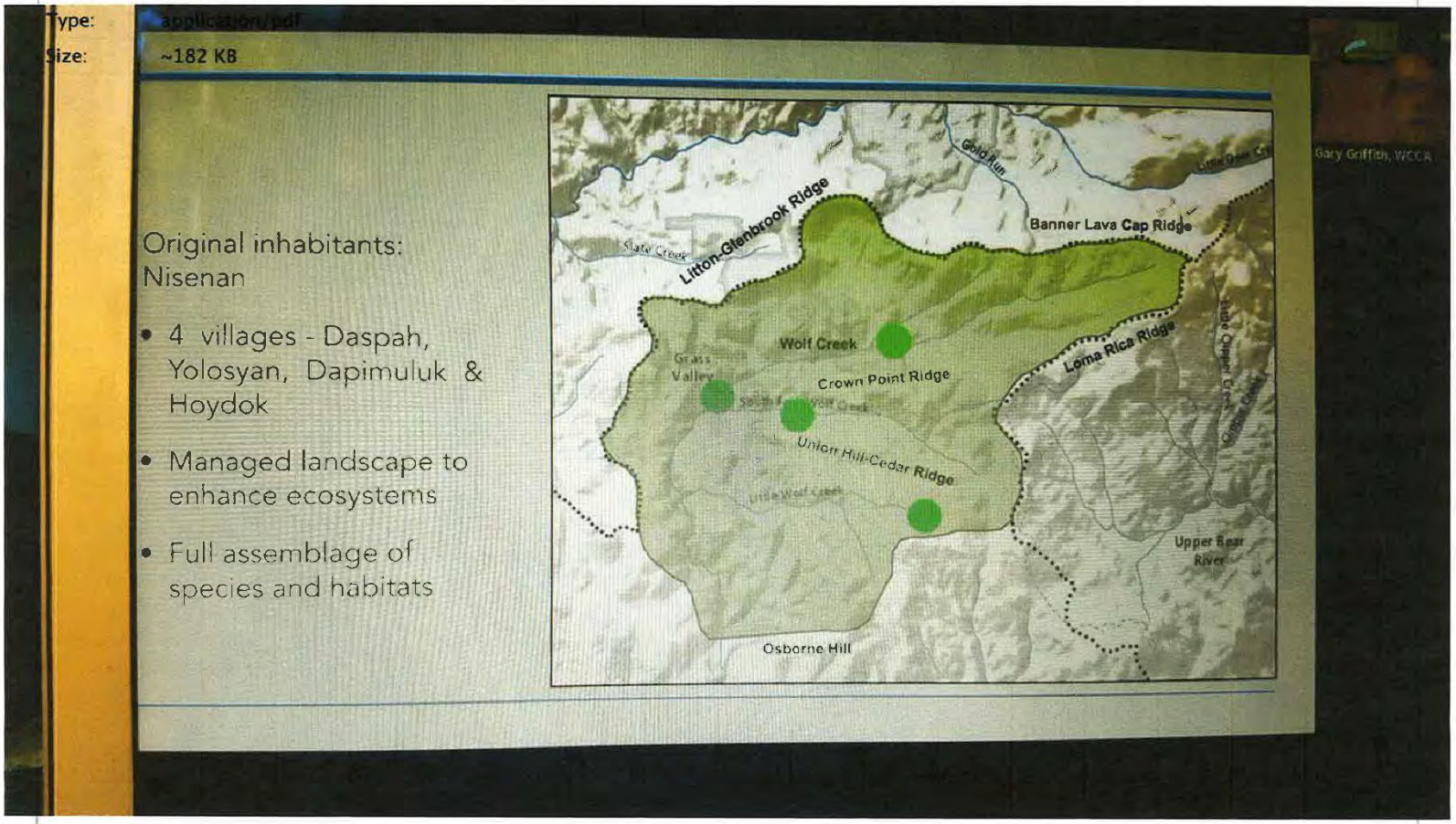

recognized and therefore had no voice in demanding or monitoring any archaeological project in the basin mandated under CEQA. The fact that there may be village sites, one with a graveyard, advises an abundance of caution. The EIR states (p. 6-26) that "the implementation of the proposed project could result in a **significant but mitigatable impact to unknown** archaeological resources and Tribal Cultural Resources." This is because disturbance of Central Hill Nisenan archaeological sites during construction is possible. The mitigation for such an eventuality is to follow established procedures by bringing in an archaeologist as consultant (4.5-2 and 4.6 ff; pp. 524-527). **This mitigation is inadequate.** How can one mitigate an unknown? The Native American Heritage Commission's Sacred Lands file preserves the record of only a tiny percentage of the places sacred to Native Californians. Heavy machinery used in construction and mining would obliterate any traces of artifacts or bones. **A mitigation by Rise Gold should include a full archaeological exploration and accompanying CRM (Cultural Resource Management Report with Native monitors). There should be sample testing at several places, especially in construction areas, prior to the project beginning. At the very least, , the area which has known bedrock mortars in the vicinity of Lake Olympia should be thoroughly investigated by professional archaeologists.** This would serve the double-purpose of discovering possible remains from the Lake Olympia recreational site: foundations for buildings, etc.

Geo-physical and hydrological evidence suggest conditions were highly favorable for Indian village site(s) in the Glenbrook Basin. This is flat valley (first used by settlers for dairying) fed by numerous springs and creeks entering the basin from both the west and the east hillsides, thus creating meadows where a diversity of wildlife flourished, ideal for Nisenan seasonal and semi-permanent camp sites.[10] The first mention of the Glenbrook Basin in the historical early 1850s was wrestling and racing events, consistent with popular entertainments drawing miners and Indians as participants, such as those documented at Storm's Ranch in present-day Chicago Park and Bouvyer's Ranch on Deer Creek in 1850s. A racetrack at that site dates back to the mid-1850s. A marsh in the southeastern corner of the basin is where bedrock mortars have been identified.

Ind 776-12

Analysis: Rattling the Bones of Our Elders/Omitting County Culture and History as Irrelevant. Since there are few if any above-ground physical remains, the point seems moot.[11] However, 1) Glenbrook Basin is a very significant place in Nevada County history, arguably the site of Nevada County's most glorious era from the 1880s to WWII when public transportation was king and environmentally-friendly: the electric tram and the narow gauge railroad linked Colfax, Nevada City, and Grass Valley. 2) More to the point: the Glenbrook Basin has always been a central place dating far back into pre-histoy. Historically, it is a hub of

Ind 776-13

[10] Geohub aAs defined by archaeologist Hank Meals, A meeting and living place based upon favorable topography where trails converge, connecting watersheds and ridges and offering access to territories of many groups," (Hank Meals). Places of abundant resources, adjacent to springs and/or wetlands favorable for trade, ceremonial events, and social transactions. See glossary, *Nevada City Nisenan.*

[11] but all that remained of I-M was a silo and a lot of mining pollution at CIP, yet it was on the Register of Historical Places.

transportation, a major artery for Nevada County. The draft EIR report's failure to acknowledge our history and current needs—the importance of the basin for travel and trade, for residential occupation, and for housing our elderly— demonstrates an insensitive and callous indifference —or deliberate obfuscation —that is highly objectionable, and should not be allowed to pass without comment. These omissions are deserving to note:

- No mention is made of the nursing homes and assisted living areas concentrated along Dorsey/ Sutton: Atria, Spring Hill Manor, the Golden Empire, Some elders still drive to or walk or drive wheelchairs on newly installed sidewalks to Brunswick Basin shops. A demographic analysis of the impact area should have been included the dense concentration of the elderly here. The 2570 acres in the Glenbrook Basin whose 73 miles of underground tunnels will be worked is an area where some of the most vulnerable County residents are concentrated: the homeless, and poorer, older, and ailing persons. A rise in ambient noise and light, seismic vibrations from explosions, construction and truck traffic, 16 hours a day, is inhumane.
- The tangible impacts to those above the tunnel area has been consistently underestimated.
- What the report fails to mention is that the reopened mine will do so much damage to a prosperous, stable, and high-functioning district with light industry, businesses, and homes. Rural residents depend on the varied services here, e.g. banks, Verizon, well service, pharmacies, etc..
- Anyone that travels on Brunswick Road from the freeway to 174 knows how dangerous it already is and that it is far worse in bad weather. Imagine how intimidating it will be for the elders of our community to have to brave 14-ton trucks, some with explosives, when they venture out to shop or buy other supplies. Traffic accidents are inevitable.

Privileging the mining history in Section 4.5 of the report creates an illusion of continuity and disguises the profoundly aberrant nature of the proposal to reopening the I-M gold mine. We are in a post-industrial historic period. We are still remediating the damage to Native people and to the environment from the last epoch of mining. What is obvious to county residents is blithely swept aside in the report: the impact zone **at an intersection of 49/20 and the Brunswick Road to 174 to Colfax is a transformation hub.** This is a "**central**" place on our landscape. Anyone who lives here knows the area is already congested and poorly planned, that Brunswick Road is dangerous, especially so in winter, and air quality already marginal and downright unhealthy during the fire season. A decline in property values is inevitable, especially for homes on Bennett Street and over the tunneling area. Property owners in this impact area were told by realtors as required by law that they were buying where underground mining rights were still active, but in a zone which banned heavy industry.. The residents of this area are the "new Indians" as history repeats itself. Homeowners, renters, and business owners—promised one thing—can continue to work and live in the mining area, but only at the cost of the destruction of their tranquility and the poisoning of lifeforms and/or total destruction of habit. No point in expecting or demanding compensation for losses; this is a one-way deal.

Ind 776-14

Ind 776-15

Conclusion: "Wherefore the future?" Rise Gold plays a double game, saying on the one hand, quality of life issues are "intangible," unmeasurable, and therefore unscientific and at same

time the report claims brazenly that qualitative evidence has been incorporated for each impact category. This is an untrue statement.[12] What we see here is a very slick strategy to "control the narrative" and thereby exclude information from the report that does not support their project about the how mining would ruin the peace,and quiet of rural life in this County.

1. **A Sustainable Future or Years of Seige?** What sureties/guarantees, permits, inspections could offset real as well as potential negative impacts and risks? The draft EIR attempts to apply all manner of technical fixes in service of corporate profit. This is one where we march forward into the past by attempting to reimpose an archaic industrial past on a post-industrial present. Nevada County is better than that. Over the last half-century, governmental laws and policies direct us towards better environmental practices: stewardship, conservation, checking the worst mistakes of the past, and implementation of technologies that reduce waste. We have mandates
    - to reduce automobile usage and greenhouse gas emissions
    - to encourage bicycle use (872, 976) and pedestrian traffic
    - to reduce our electricity consumption and water consumption
    - to improve the health of our forests
    - to improve aesthetics by imposing building codes
    - to clean up polluted areas and cease poisoning our rivers and creeks.

Approval of the Rise Gold's mining operations would require a number of code changes, one allowing unsightly, post-apocalyptic, 7-story high piles of mine rock, another returning Glenbrook Basin to an industrial rezoning. While engaging in stone-walling denial that degradation of the environment is "significant," the report shows degradation on multiple fronts. To rezone the Basin now, would be a betrayal to homeowners and just cause for litigation.[13] Approving the mine is going in the wrong direction. Nevada County Board of Supervisors should be leading us to a better future, not a worse one. We have a beautiful landscape, a growing population, and booming tourist industry. Why not show some character and vision, and put the mass back into transit, and make Nevada County a pioneer in implementing environmentally-friendly technologies? It was quite alarming to hear at the public hearing last Thursday at the Rood Center that Rise Gold 's use of electric power would gobble up most of the hard-won gains of electricity conservation. Consumers should not be asked to conserve so that foreign investors can profit. Economic benefits to County residents are chimerical; this propaganda should be exposed for what it is. Far more jobs and County property taxes will be created by projects that are approved or are reasonably foreseeable in the next five years (4.12-35, 4.12-43; pp. 886. 899)

[12] 1 On page 1028 [Section 6.3], the report states that quantitative and in some cases qualitative evidence has been consulted for each impact.

[13] Tony Lauria, *Union*, March 7, 2022, A4; cf. https://www.waterboards.ca.gov/rwqcb5/

Ind 776-16

Rise Gold, as many have pointed out, is not a reliable partner, and Ben Mossman is not credible. Canadian mining companies have a notorious record of making false promises and leaving environmental messes off-shore and within California itself in recent years,.[14] The Canadian Sonora Mining Company, for example, skipped town and left the taxpayers of California with a $30 million dollar clean up at the Jamestown Mine. Rise Gold has shown a willingness to make mitigations in Nevada County, but only when it is pressed to do so. In the course of this review process, some critics have suggested Rise Gold be required to put up sizable amounts of money to cover costs to individual well-owners or to the County. More numerous and regular and frequent site inspections or monitoring by objective, third parties could be required. I see these as ineffectual. **Could there ever be enough monitoring to ensure pollutants weren't entering the air or water.? How could we be exempt from freak accidents or meteorological events like windstorms or floods?** Realistically, as Robert Hubbard of the CEA and others have pointed out, once the mine is up and in operation and making profits for its non-resident investors, Rise Gold would simply pay penalties rather than cease operations and correct the violations. Worst comes to worse, taxpayers are left with clean-up costs as they were at Jamestown mine. Personally, I would like to see test runs, as well as more scientific study. 14-ton trucks should run up and down Whispering Pines and Brunswick 16-hours a day to see if anyone notices increased noise or traffic congestion. As a sign of trustfulness and commitment to the well-being of our community, Rise Gold should first clean up the Centennial Industrial Site to community members' satisfaction; then and only then will we consider reopening the Idaho-Maryland mine.

2. The real core of the problem, however, is this: Rise Gold has put us on the defensive in our own land. Our safety depend on regular monitoring, honesty, and proper enforcement. Hundreds and hundreds of hours by private citizens, environmental groups, and county government employees have already been expended to protect the status quo. (I have put in more than 200 hours working on this existential threat.) If approved, thousands more hours will be required to minimize the environmental degradation to come and to avert potentially catastrophic destruction. Why should we allow Rise Gold to put us in this unpleasant and unending role? A vastly expanded government bureaucracy would be necessary to serve as a watchdog over mining operations of this scale (the largest operating gold mine in the nation?!) and to enforce penalties. To paraphrase political analyst P.J. O'Rourke: Government can't be tasked to do everything and expect it to be well done.[15]

[14] For example, Canadian Mining in Latin America: Exploitation, Inconsistency, and Neglect June 11, 2014 COHABy Malavika Krishnan athttps://www.coha.org/canadian-mining-in-latin-america-exploitation-inconsistency-and-neglect/#:~:text=Canadian%20firms%20such%20as%20Barrick,the%20development%20stage%20%5B3%5D.

[15] Quote from *Parliament of Whores.*

Do we really want to enlarge our rural county government to serve as a counter-balance to Big Business? Is it really a good use of our resources to have our bureaucracy expand to do such things as send a wildlife biologist (4.34-36) out to rescue a single western pond turtle? Far better not to endanger it and its/her/his fellows in the first place. The County would have to engage lawyers to force Rise Gold to pay for alleged violations of its contractual agreements, and this would go on and on and on. With the enlargement of our chronically-underfunded County bureaucracy to counter a wealthy business enterprise comes the increased opportunities for bribery and corruption. The County government may be seduced by the prospect of income for the County government: jobs-creation and power expansion from huge permitting fees. Taking a lesson from history, the Bureau of Indian Affairs (or Office of Indian Affairs) was originally created within the Department of the Interior with good intentions: to protect, serve, and uplift the Native people. As time passed, the Bureau's size and budget grew until 50 % of its budget was expended to pay the salaries of non-white employees, and an unfortunately large number of government employees engaged in graft and skimming, exploiting the very people they were supposed to serve. If approved, whose interests will the County of Nevada be serving over the course of the next 80 years: the mine owners, or the people who are its first responsibility: County residents?

CEQA was intended to protect the environment against environmental polluters. Rise Gold has misused a process designed to protect human beings, by turning the EIR into a document that dismisses our quality of life as "insignificant" as well as our culture and our history. The correct take-away from this report is: **"the project's incremental contributions to the significant cumulative impact is cumulatively considerable." (4.0-3)**

Respectfully,

Tanis C. Thorne
14504 Hobnob Way, Nevada City

Appendix: Glenbrook Basin (aka Brunswick Basin)[16]

In the mid-1880s, county boosters advocated for the creation of a county fair, and Glenbrook was chosen because of its central location by a 6-1 vote. (*Nevada County Daily Transcript*, April 4, 1885).People could walk there from both Grass Valley and Nevada City. it was a prime candidate because of its existing racetrack, a staple of county fairs at that time. The goal was to create one of the best race tracks and fairgrounds in the western United States; it was"the biggest racetrack in California" according to Vince Seck . The opening was attended by Leland Stanford and California Governor George Stoneman, General Francis Amasa Walker (president of MIT) and Stephen Gage of the Central Pacific Rail Road. 500 persons attended the ball. A dedicatory speech was delivered at the Nevada Theatre by Aaron Sargent. In 1887, the race track became world-class electrification, likely having the distinction of being the first illuminated sporting

[16] Brunswick Road bisecting the Glenbrook Racetrack carried traffic to the Brunswick Mine;

event at night on Sept. 8, 1887. In 1889, a brook feeding the marsh was damned to create the 2-acre, artificial Lake Olympia (near Plaza Road and Sutton Way).

In the early 1900s, Lake Olympia and Glenbrook Race Track were at the first peak of their popularity. In August 1901, the Nevada County Traction Company, the electric rail line linking Grass Valley and Nevada City, was completed and the first electric car from Grass Valley arrived at Glenbrook. The Traction Company had 4 streetcars running between Pine and Broad Streets in Nevada City and Boston Ravine in Grass Valley (departing hourly from NC) and , passing through Glenbrook Basin near where Olympia Way meets Brunswick Road today. The fare was 15 cents each way. The Traction Co had a successful 25 year electric streetcar line. Coaches were 32 feet long holding 32 passengers inside and 12 outside. On big events, cars left at 15 minute intervals. The opening of the electric road was dedicated with concerts, reception, parades, dances, the ringing of bells, and mine excursions.

Also in 1901, Lake Olympia had been developed as 15 acre park with a dance floor and pavilion on an artificial island, swimming, canoeing, high diving, summer tourist cabins, confectionery, bar, and bath houses. Teddy Roosevelt visited in 1903. Lake Olympia was reputedly the "most popular spot in Nevada County", a "social and recreational center of Grass Valley and Nevada City. "It was a little piece of paradise, like a 'fun world' today," said local historian Ron Sturgell. "Lake Olympia will always live on in our memories."

In the first half of the 20th century, Glenbrook basin remained the premier location for recreation in Nevada County; its dance hall was the most popular in the county, thanks to the excellent mass transit system in place. It was cheaply and easily accessed by county residents. Residents (miners, ranchers, orchardists) could and did travel from Chicago Park on the narrow gauge railroad to recreate, picnic, tennis, swim, listen to live music and dance many nights a week. Race cars replaced horses at the racetrack, attracting large crowds and competitors from across the western U.S. In the 1920s and 1930s, Big Bands regularly made appearances at Lake Olympia. Lionel Hampton and other big-band musicians provided entertainment on weekends. "There was always good music there," said Helen Williams. Williams grandfather helped build the spring floor. "the floor would really bounce," she said. Soldiers stationed at Beal Air Force Base came to dance at Lake Olympia, a popular place for rest and recuperation during World War II.

Thanks to its productive gold mines and low unemployment, Nevada County enjoyed prosperity and entertainment at the Glenbrook Basin while others in the nation struggled. Nevada County residents swam and danced at Lake Olympia. Adjacent to the Idaho-Maryland mine, Glenbrook's racetrack and Lake Olympia were the two symbiotic sides of Nevada County life: the economic and the social. Each was served by the remarkably efficient and environmentally-friend infrastructure of electric street cars and railways.

Sources:

The major secondary sources on Glenbrook Park are Juanita Kennedy Brown, *A Tale of Two Cities and a Train* (1987) and David Allan Comstock, *Greenbacks and Copperheads, 1859-1869* (1995). Most of the information is drawn from Union newspaper articles; see for example, a 3 part series Nov. 28, 29, 30, 1991. Some clippings are preserved in the Landmark Commission

corrected typos and grammar, 4/5 13 of 13

file on Glenbrook Basin, Searls Library (NCHS). Dozens of photographs of the the racetrack and Lake Olympia are preserved there as well; others are found in the Dorsey Collection, Bancroft Library, Berkeley, California. Vince Seck, whose family were the last owners of Lake Olympia has a good collection of photos and newspaper clippings.

INDIVIDUAL LETTER 776: TANIS THORNE (2)

Response to Comment Ind 776-1 through 776-16

This letter is a duplicate of Individual Letter 775. Please see Responses to Comments Ind 775-1 through 775-15.

Individual Letter 777

March 23, 2022

Nevada County Planning Department
950 Maidu Avenue, Ste 170
Nevada City, CA. 95959-790

Attn: Planning Commission/Board of Supervisors

To whom it may concern:

Ind 777-1

My name is Ted Ahrens and my wife and I have been residents here in Nevada County for 17 years. Since I am a pilot, the airport here attracted me originally, but the great outdoors and the natural habit drew us both to this area.

I fear this habitat is now in jeopardy with the proposed mine and I am very much against it due to its effect upon it. I am concerned about its impact on our air quality and our water quality. It very likely will drain our ground water sources which may affect our wells that are already being threatened by droughts. I am also troubled by the thought of the diesel fumes and constant noise the equipment will put out. This mine will definitely affect our quality of life in many ways in Nevada County.

As I understand this proposal, there is no independent monitoring of any of these issues and I would like this inadequacy to be addressed. I would also appreciate a response to my concerns as they are the same as just about everyone I know around this area. We already have so many reasons to flee California with the drought, fire and tax issues, and we don't need another reason to leave.

Sincerely

Ted Ahrens
AV8Ted@gmail.com
14974 Quartz Lane
Nevada City, CA. 95959

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 777: TED AHRENS

Response to Comment Ind 777-1

The commenter states that no independent monitoring program is proposed for the project. Among the many mitigation measures required in the DEIR are monitoring programs for noise (Mitigation Measure 4.10-3), vibration (Mitigation Measure 4.10-4), and groundwater (Mitigation Measure 4.8-2), all of which will have oversight from Nevada County. In addition, Chapter 4 of this Final EIR contains the mitigation monitoring and reporting program that will need to be adopted by the Nevada County Board of Supervisors, if the project is approved. The MMRP includes all of the project mitigation measures, identifies timing for completion of mitigation requirements, and identifies local and state agencies responsible for monitoring. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 - Operator Responsibility.

Regarding groundwater resources concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Regarding diesel exhaust, the DEIR's health risk assessment analyzed diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the DEIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HRA presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR.

Regarding operational equipment noise, please see Response to Comment Ind 733-4.

Regarding drought concerns, please see Master Response 16 – Drought and Climate Change.

Quality of life concerns are outside the scope of CEQA – please see Master Response 1.

Individual Letter 778

March 28, 2022

Teresa Eckerling

520 Linden Ave

Grass Valley, CA 95945

530-277-6157

TO Matt Kelley, Senior Planning, Nevada County Planning Department

950 Maidu Ave, Suite 170

Nevada City,CA 95959-7902

Dear Mr. Kelley and the Nevada County Planning Department

Ind 778-1

I do NOT support the reopening of the Idaho Maryland Mine. Our county does not need the additional air and water pollution, traffic congestion, and excessive noise 24 hours a day. This is insane!! The opening of the mine will cause many to move away including my family, it will hurt local tourism with all the noise and congestion. Our community will see increased medical issues straining our medical resources. We see the water treatment near the Empire Mine due to continued leaching of chemicals that are still underground from prior mining. At a time we are trying to save the earth, reduce fossil fuels, slow climate change and protect our endangered species we can not go backwards and further damage future generation. I urge you to reject the mine project. Save our county, our community, our lives.

Thank you

Teresa Eckerling

RECEIVED
APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 778: TERESA ECKERLING

Response to Comment Ind 778-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not enable a more specific response. For concerns related to air, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. For concerns related to water pollution, please see Chapter 4.8, Hydrology and Water Quality and Master Response 35 – Discharge to South Fork Wolf Creek. For concerns related to traffic, please see Chapter 4.12, Transportation. For noise concerns, please see Chapter 4.10, Noise and Vibration.

The commenter's opposition to the proposed project is noted for the record and has been forwarded to the decisionmakers for their consideration.

Individual Letter 779

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Phone: 530-265-1423
Email: Idaho.MMEIR@co.nevada.ca.us
Re: Idaho Maryland Mine

January 15, 2022

Dear Matt,

Each season I listen to the music of Wolf Creek outside my door and hope for another year of clean, sufficient water. One year ago, I wrote a letter to each member of the Nevada County Board of Supervisors, adding my voice to the many citizens expressing concern over the environmental, economic and health concerns that I believe will place a damper on the progress this county has made since the original Gold Rush days if the Rise Gold Mine is approved.

Ind 779-1

I will readdress those concerns below. In the meantime, I want to add that recent letters to the editor in the Union have cited some important questions and alternatives. Dan Desmond voiced what many have expressed—shock that Rise Gold's environmental impact report has continued to receive misleading and positive press coverage, after the original "survey" misreported public support. The letter to the Union stated that Paul Schwarz had offered environmental alternatives. Another letter to the editor from Eric Zibbel offered a specific idea of expanding the Nevada County Fire Safe Council's free green waste drop-off program on the mine site. He wondered, however, how to start such a civic-minded business on land already owned by Rise Gold. Was Rise Gold permitted to purchase the property without first permitting the use? Can they be forced to sell or lease it to the county if their business permit is not granted?

I'm sure I echo the thoughts of many professionals, homeowners, commuters, business owners, environmental advocates, health care workers or patients with health concerns, and citizens concerned about the legacy their children and grandchildren will inherit -- people who have already weighed in around the breakfast table, at the very least, on the various reasons not to approve the environmental impact statement for the mine. Some have spoken up in writing. I will restate these concerns anyway:

Health and Air Quality:

Respiratory therapists have expressed alarm at the devastating potential impact of building this mine. Already, we face poor air quality through the long and intense wildfire seasons. Adding asbestos or other invisible dangerous chemicals involved in the creation and operation of this mine would further jeopardize the health of people with asthma, COPD, and heart or lung conditions.

Traffic Flow:

The new congestion caused by the trucks transporting the materials across town would clog major thoroughfares each day. Increased traffic drives away new business as well as out-of-town homebuyers

1

formerly attracted to the beauty and pace in this county. Those seeking solace—as tourists, potential businesses, and real estate shoppers—would spend their dollars elsewhere.

Noise Pollution:

Businesses and other agencies within earshot of the mine would feel as though we have turned the clock back 170 years, to a time when the need for economic growth justified the noise impact of mining in Nevada County. Today, it is unjustified. In-city mines are rare largely because they fail to consider the needs of a community's safety and quality of life.

There is no certainty that new jobs at the mine would add to economic growth as much as the mine would interrupt the economic benefits Nevada County have already worked so hard to develop, through tourism, agriculture and technology—options that promote sustainability of humans, the environment and the economy.

Environment:

Many of today's Nevada County citizens came here because they value the environment rather than to monetize untapped geologic resources. New clean energy jobs and recreational options better allow us to preserve our natural resources. Creative thinkers in our county have suggested several alternatives. Why not consider them?

Property Values:

Ind 779-2

As a result of these and other potential impacts, some realtors fear a decline in property values based on rumors of an intown mine. A continuing decline in prices could destabilize an economy already facing issues of survival and revival in the post-Covid-19 days to come. Due to its visibility and impact on anyone conducting personal business in town, the mine could reduce the price of homes throughout the county, not just those in the surrounding neighborhoods. A decline in property values would also affect the long-term property taxes collected in the county. How would these hardships be offset?

Ind 779-3

Please preserve the long-term legacy of the county's planning division. Some of us were very pleased when the county took a long-term view by installing solar panels near Champion Road to power county facilities, honoring long-term benefits over short-term costs. We hope that, once again, the future impact of this decision on the quality of life in Nevada County will remain a priority. Our economic health and sustainability depend on sensitivity to a complex set of factors and openness to alternatives, it seems. Please consider this public perspective as you faithfully strive to ensure the well-being and diverse needs of our community members, who feel certain that mining impacts could negatively affect the health, resiliency, and quality of life of current constituents and their descendants throughout the coming century.

Sincerely,

Teresa Langness
17512 Brewer Road
Grass Valley CA 95949
tlangness@gmail.com

INDIVIDUAL LETTER 779: TERESA LANGNESS

Response to Comment Ind 779-1

The commenter refers to others who have allegedly identified alternatives to the project. It is noted that the DEIR evaluates alternatives to the proposed project in Chapter 6. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers. Regarding the commenter's generally noted noise concerns, please see Response to Comment Ind 733-4.

The commenter also expresses social and economic concerns, which are outside the scope of CEQA – Please see Master Responses 1 and 2.

Response to Comment Ind 779-2

Please see Master Response 2.

Response to Comment Ind 779-3

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not warrant a more specific response. Please see Master Response 1.

Individual Letter 780

From: Teresa Wagner
To: Ed Scofield; bdofsupervisors
Subject: Re: Mine
Date: Saturday, February 19, 2022 6:46:44 AM

Dist 2

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Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Ind 780-1

Please do not allow this to happen to our town.

NO RISE MINE

Thank you,

Teresa Wagner
10958 Henson Way
Grass Valley
530.210.0173

INDIVIDUAL LETTER 780: TERESA WAGNER

Response to Comment Ind 780-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration. Please see Master Response 1.

Individual Letter 781

RECEIVED
APR 04 2022

April 4, 2022

To: Matt Kelley,

Senior Planner/ Project Manager

Nevada County Planning Department, and Nevada County Planning Commission

Re: Rise Gold Mine Proposal EIR

The Rise Gold Mining Project for the reopening of the Idaho Maryland Mine has produced an EIR that is riddled with errors, misleading plans, and unspecified impacts. The inadequacy of the EIR and the potential for serious impacts to this community should not be accepted. Please have common sense and do not approve of this project.

Some of the specific issues:

Air Pollution from an incredible number of probable truck trips resulting in climate change and worsening particulate content to challenge asthmatics like me.

Water Pollution into our downtown stream of Wolf Creek which already has compromised quality.

Ind 781-1

Toxic Waste of asbestos laden mine rock to the Centennial site in the heart of our downtown!!

Well water losses that cannot be made up for by hooking up NID. Resulting ongoing costs to homeowners as well as decreased property values.

The unbearable noise for all human and especially wildlife that lose survival functionality.

The traffic congestion, accidents and road wear from trucks overloading our 2 lane roads with blind driveways in particular.

Lack of adequate and bonded cleanup measures from ongoing operations as well as a reclamation plan that can serve in perpetuity. Mossman is not to be trusted based on his history with prior Canadian projects.

Detrimental losses to our business community from decreased travel related uses and needs.

I have owned property in Nevada County since 1977, and bought 3 homes here. So, I have a vested interest in the well-being of our community and our intrinsic environment, and trying to maintain our high quality of life that would be substantially altered with this project.

I am a retired Land Use and Transportation Planner, as well as a Fish and Wildlife Biologist who has critiqued many EIRs. The Rise Gold EIR just doesn't cut it, nor does its plan to permanently disrupt and alter our peaceful and serene quality of life.

Thank you for your consideration,

Terri Pencovic

12430 Squirrel Creek Road, Grass Valley CA 95945

INDIVIDUAL LETTER 781: TERRI PENCOVIC

Response to Comment Ind 781-1

The commenter's quality of life concerns are outside the scope of CEQA – please see Master Response 1.

The commenter asserts that the DEIR is riddled with errors, misleading plans, and unspecified impacts, but provides no specific evidence, only general concerns. Regarding air pollution from truck trips, the DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the EIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HR A presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR.

Regarding water pollution concerns in Wolf Creek, please see Master Response 35 – Discharge to South Fork Wolf Creek; regarding concerns about deposition of mine waste on the Centennial Site, please see Master Response 8 – Mine Waste Characterization; regarding water well concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells; regarding noise concerns, please refer to Chapter 4.10, Noise and Vibration, and for effects of noise on wildlife, please see Chapter 4.4, Biological Resources (pg. 4.4-74ff).

Regarding road wear concerns, the DEIR analyzes impacts to pavement in Chapter 4.12. Specifically, the DEIR requires the Project Applicant to enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impacts to pavement. (DEIR, Mitigation Measure 4.12-6(b).)

As stated on page 4.6-24 of the DEIR, to ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan. Please also see Master Response 3 – Operator Responsibility.

Individual Letter 782

From: Terry Anderson <itstea@gmail.com>
Sent: Wednesday, March 30, 2022 10:00 PM
To: Idaho MMEIR
Subject: Mine proposal

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Ind 782-1

My family is NOT in favor of granting a County permit to operate the mine in Grass Valley. It will ruin our towns character. This is 2022 and the mining industry in this County is history. Take a look around and explain how this foreign enterprise helps our communities.

No on the mine.

Terry and Connie Anderson
15245 Lewis

Virus-free. www.avast.com

INDIVIDUAL LETTER 782: TERRY AND CONNIE ANDERSON

Response to Comment Ind 782-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration. Please see Master Response 1.

Individual Letter 783

I support re-opening the Idaho-Maryland Mine NO!

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new good jobs is a once-in-a-generation opportunity to revitalize our local economy.

I DO NOT SUPPORT THIS

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also save an additional 300 jobs through related new business in the area. This project will engender the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind 783-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Terry McLaughlin

Address Grass Valley

Phone

Email Address

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

INDIVIDUAL LETTER 783: TERRY MCLAUGHLIN

Response to Comment Ind 783-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration. Please see Master Response 1.

Individual Letter 784

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: TESS LOTTER

Address: 2036 NEVADA CITY HWY, GV, CA, 95945

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

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

Ind 784-1

This mine will completely devastate our water, plant, soil, animal life and air quality
Eighty years of noise pollution and disruption to our community is not worth any amount of money
You will have bad karma if you let this go through, you will have the ~~fff~~ weight of all the lives you negatively affected, including all the children of the future generations

INDIVIDUAL LETTER 784: TESS LOTTER

Response to Comment Ind 784-1

The comment does not address the adequacy of the DEIR, but expresses general concerns and opposition to the proposed project – please see Master Response 1. Regarding general water concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells; regarding general air concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; regarding concerns about impacts to plant and animals, please see Chapter 4.4, Biological Resources; and regarding general noise concerns, please refer to Chapter 4.10, Noise and Vibration.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 785

RECEIVED
APR 04 2022
NEVADA COUNTY
PLANNING DEPARTMENT

April 4, 2022

To: Matt Kelley, Senior Planner
Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

RE: Denying the Idaho-Maryland Mine re-opening

Dear Commissioner Kelly,

I have lived in our wonderful Sierra Foothills since 1994. Our home off Greenhorn Road and the neighborhood in which we live, has been a joy since we arrived. Our water-source, is a pristine well 275' beneath our home, providing clean, fresh water since the house was built in 1974.

A half-a-mile away, at the bottom of Greenhorn Road, is the intersection of Greenhorn, Brunswick and Bennett roads, facing the old head-frame tower (silo) on the corner of the proposed industrial site of the often re-proposed Idaho-Maryland Mine. Each time the new Use-Permits are resubmitted to the Planning Commission and County Supervisors by Rise Gold or its predecessors since 1999, our collective neighborhood's hair stands on end! And, each time the applications are denied, we breath collective sighs of relief and hope it's the LAST time!! Not surprisingly, we have a number of serious concerns about the possibilities of the mine's reopening and the destruction of our local grounds, in favor of foreign investors, milking our lands for their own personal gains. It strikes me as odd, that we would consider allowing such a foreign mining company to arrive in our beloved and historical land, to extract our "golden ground," to feather their own nests, to no reasonable advantage to us, while then continuing to extracting over the forthcoming 80 years, incredible benefits for themselves. From nearly all perspectives, it is tantamount to allowing foreign invaders to freely extract our local wealth, and remove it from our needs, exploiting every last ounce for their own benefit. And, proposing to do this, 24/7/365, for eight forthcoming DECADES. Then they can leave US, the dirty remembrances of their intrusion into our extraordinary geological gifts. Why am I so adament?

785-1

Because of my background, I have a very deep understanding of the history of The West, including the Gold Rush, mostly because when the gold ran out, and/or met the limitations of gold mining technology, the coastal populations focused on the development of agriculture along the entire west coast instead. One venture leading into another, making California in particular, one of the wealthiest agrarian societies in the world. Today, my home is Grass Valley, and I have been a professional musician with a fifty-three year career, and produce shows here in our fair region. I grew up in the lumber business and building trades, as well, so I have an understanding of how important water and environmental security is to everyone! Also, in the 1990s, I became a member of the Auburn Gold hounds, and practiced placer mining for several years, beginning my still-growing education about gold and mining in Placer and Nevada counties.

Today, however, my neighbors and I share a deep concern for the health and prosperity of our region and its resources. Besides drought, fires and excessive development, the potential return

of gold mining, and specifically the 24/7/365 EIGHTY-YEAR proposal of mining 2,585 acres of mining rights in our roughly 3,000 acre town if Grass valley, is of great concern to everyone I know, and particularly to myself. And, not lost to many folks, is that the developer/operator of this "person" is a Canadian company, Incorporated in Nevada, and plans to take this wealth out of our region! On top of that, should he decide to give up mining at some future date, he can sell the mine to the highest bidder/country, and head home with the spoils, leaving an environmental mess for US to clean-up, which is historically the way mining companies behave.

My studies have revealed that from the century of 1848 to 1948, gold was veritably stagnant at $20. until 1932, and reached the record high price for gold at $40. at the end of WWII (1946-47). When the I-M Mine closed in 1956 (66 years ago), the price of gold was $35.20. [1] Forty-years later, in 1996, when the NC Board of Supervisors permitted Dewatering the mine for exploration, the price had reached reached $369.00, which was a record at that time. In 2015, seven years ago, gold settled at $1,060. But, today, something dramatically significant has changed, the price of gold is now percolating near $1,950.00 per ounce, or $31,200.00 per pound, five-times the value 26 years ago, which definitely has a certain Canadian mining company "licking-its-chops." (1) (https://onlygold.com/gold-prices/historical-gold-prices/)

As you are aware, in the past twenty-plus years, several prior incarnations of Rise Gold, have attempted and failed at being granted a permit to reopen, for myriad reasons. The most recent DEIR, featuring 1,069 pages, seems a deliberately overboard attempt to flood us with SO MUCH information, that many will turn-away from it. "beat them over the head with facts, so they turn-off and walk away."

Finally, In my many months of research, I have read countless books, maps, articles and dug-deeply into gold history on the Internet, as well. My larger bodies of research include sections on mapping the historic locations of claims and mines in Nevada and Placer counties. I have a small library of materials and books on these subjects. I attempted to down the DEIR, and it's 1,069 pages were too much for my computer. In attempting to read it on the county website, it crashed three times. I have attended meetings, not least of which the most recent at the Planning Commission Meeting Monday April 4th, sitting right behind you, as a matter of fact. I have been on Zoom meetings with the NID board, met with groups and individuals regarding the trouble Rise Gold is bringing. I have many times, countered and corrected Mr. Mossman's... exaggerations on their milers, which paint a very deceiving picture. I have seen him speak online, and researched his company, his press in British Columbia, studied his history. Most recently, I researched in depth the potential hazards of the mine, its operations, past troubles from books and interviews on specifically the I-M mine. I rewrote the contents of the book "Gold in Quartz: The Legendary Idaho Maryland mine" by Jack Clark, synthesizing it down to the actual history and events, without all the figures, pay-scales, etc. It was a true learning experience to walk through that history word for word, and in typing it out, I absorbed the play-by-play of its history (a copy of which I have included after this letter in case you have not read it. I did this also because I have been an author on the history of the Pacific states, from B.C., Canada to Southern California and beyond, for over 43 years as part of my career. I grew up in lumber milling in the 1970s in the bay Area where my father owned four large lumber yard/home improvement yards from 1946 to 1991. My background in Western American history helped lead me to living in Grass Valley!

So, today I am extremely concerned with the nowadays sinister idea that reopening one or more gold mines here, would be a grand disaster for the region for myriad reasons. But, in particular, I will mention here those at the top of my ongoing lists and research. However, rather than be long-winded on all this, I am enclosing a number of research articles and papers I have created, which I feel constitute the current contents of the "letter" I wish to give you today. My OWN binder is more than four inches thick with related material. But, regarding the "NEED FOR A NEW DEIR, I feel all these needs should be address scientifically and clearly, verifiably, before ANY permits are awarded, even exploratory ones beyond what they have already exercised. Thank you for your time and consideration!

Sincerely,

Thomas P. Jacobsen
P.O. Box 791
Weimar, CA 95736 (I live in Grass valley, but have maintained an office in Weimar since 1994. This is my office address and mailing address. Because I m in the art business, I do not publish my physical address.)

"Gold mining is one of the most destructive industries in the world. It can **displace communities, contaminate drinking water, hurt workers, and destroy pristine environments**. It pollutes water and land with mercury and cyanide, endangering the health of people and ecosystems. In Nevada County's case, Arsenic, Cadmium, Silica, Talc, ... I can go on at length...

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Post Office Box 791
Weimar, CA, 95736-0791 U.S.A.
patj@fruitcratelabels.com
Tel/Fax: 1.530.637.5923

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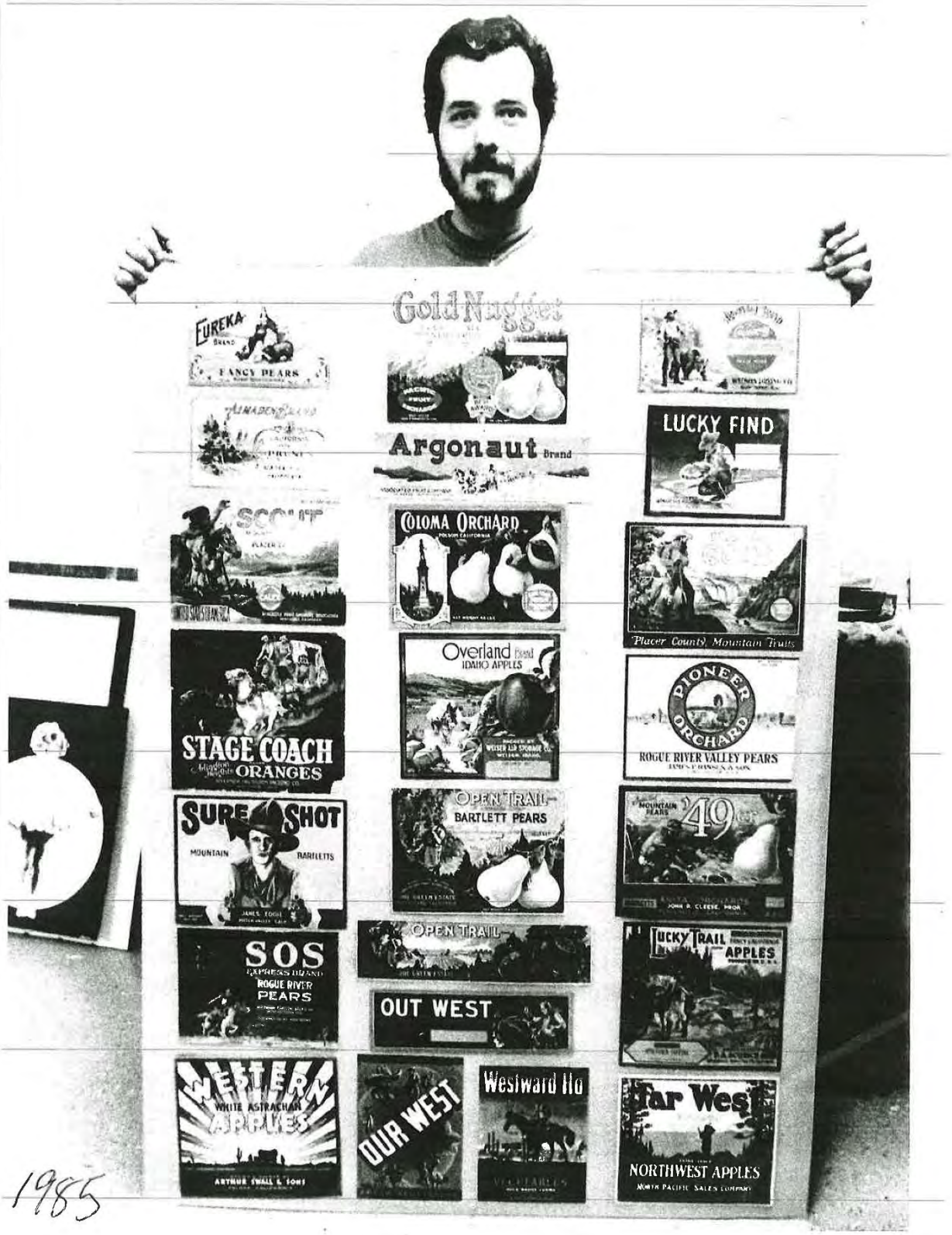
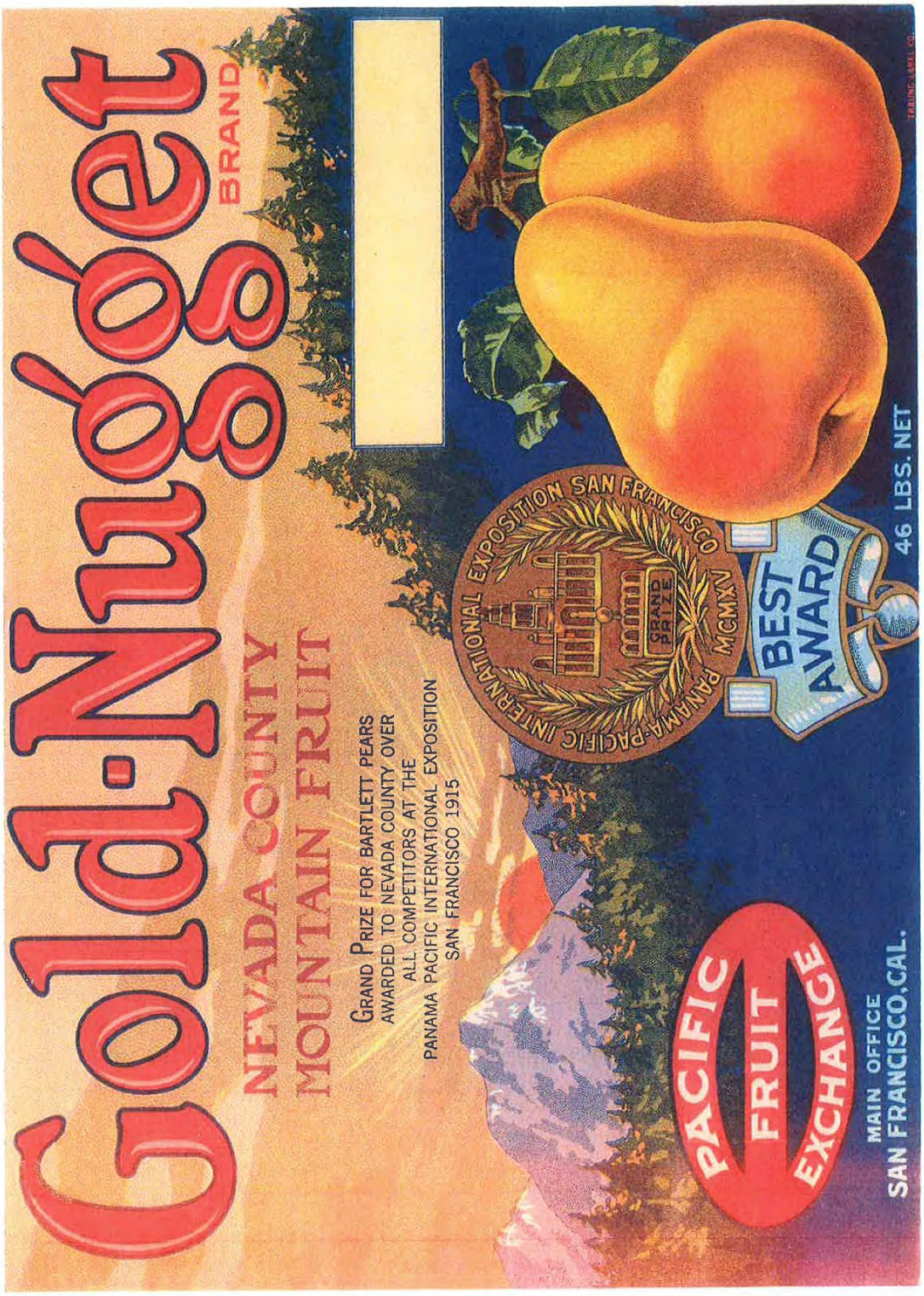
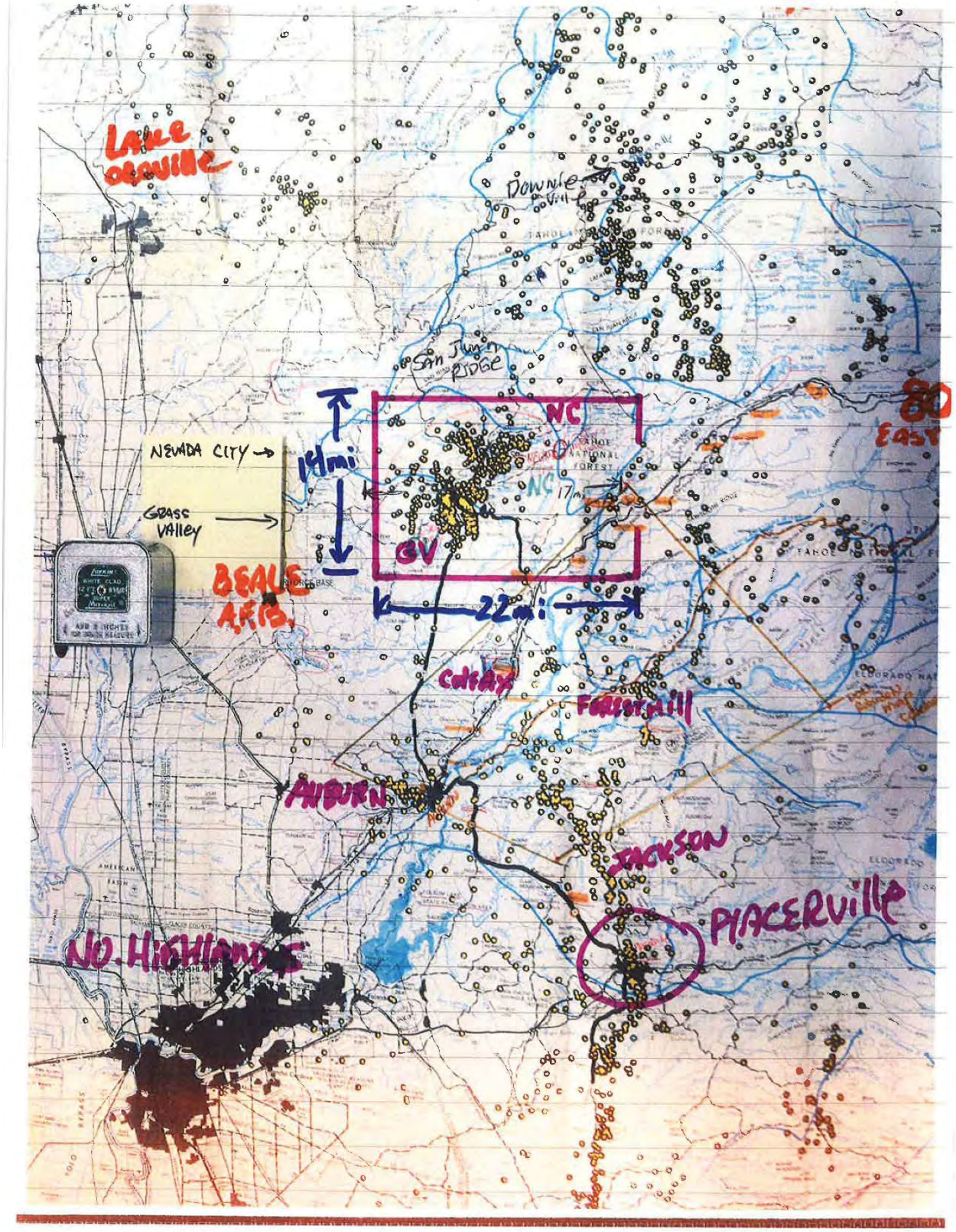
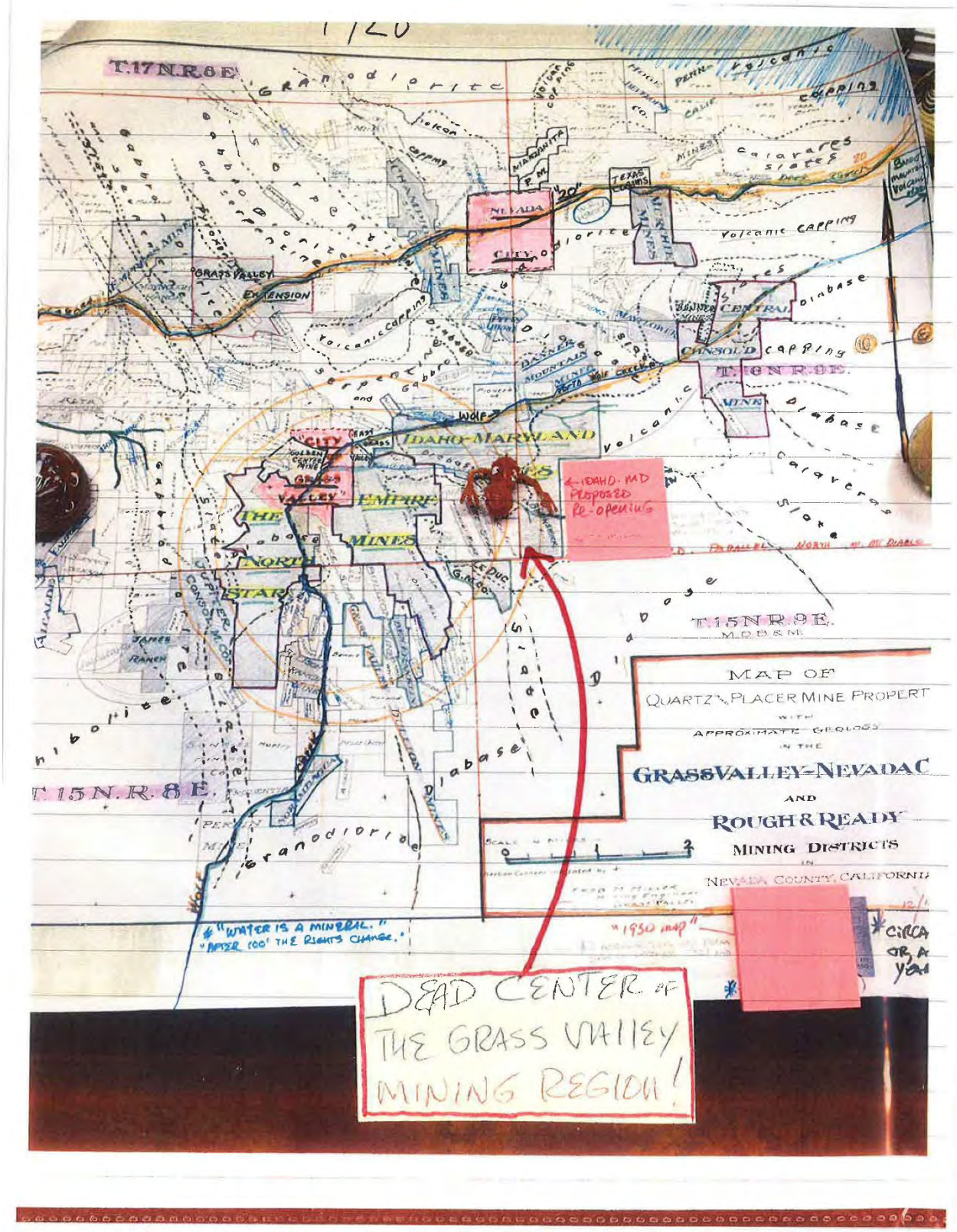
**I delivered this on Mon Apr 4, 2022 to matt kelly's office at the rood center, NC, at 4:25 P.M. They accepted my BINDER with 3/4 of an inch of material and said they would "treat it like a single letter," which is what i thought/hoped they would do, and they did! In before the deadline!!!!! :) Patio*

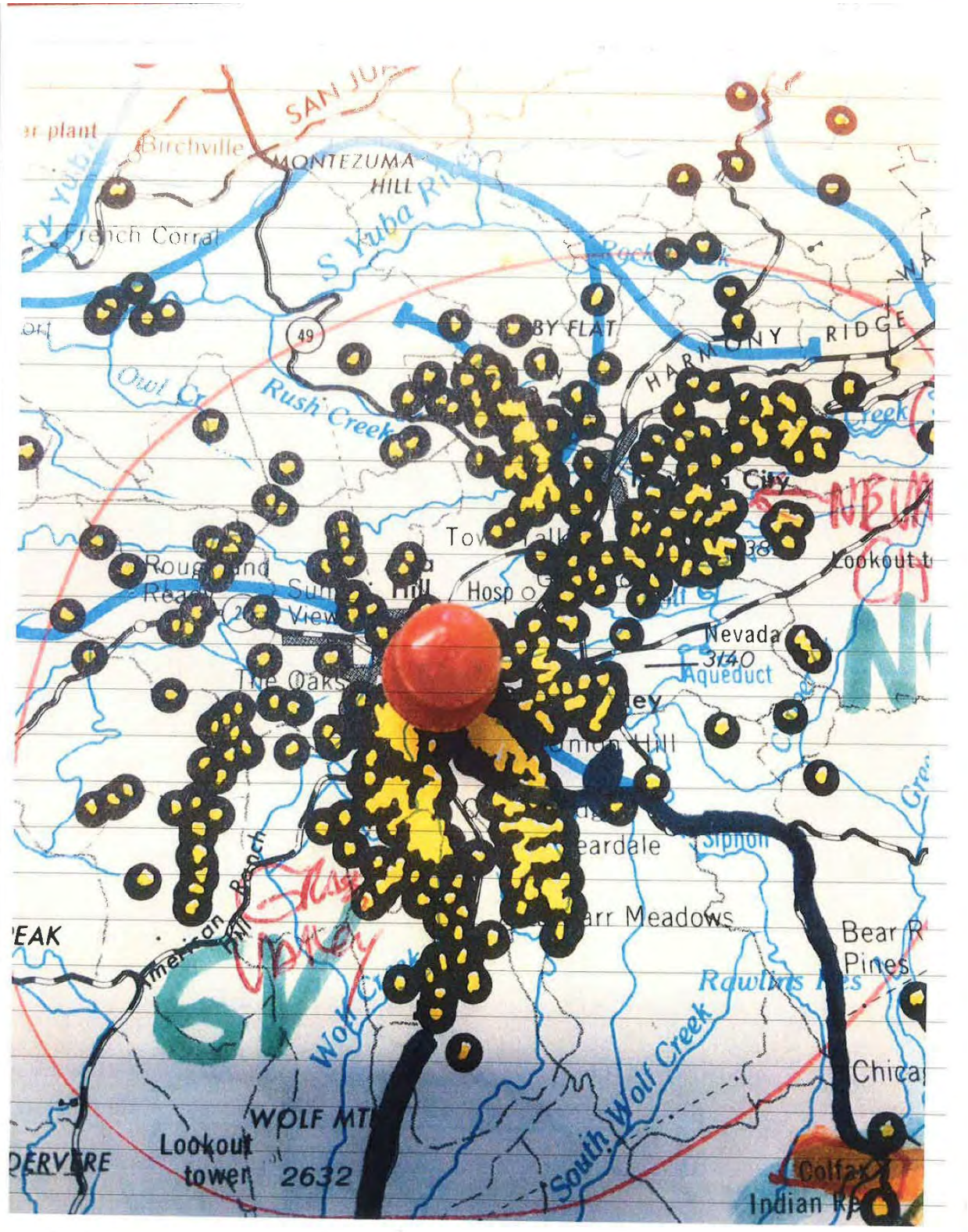

EUREKA
FANCY PEARS
Gold Nugget
Argonaut Brand
LUCKY FIND
COLOMA ORCHARD
Placer County Mountain Fruits
STAGE COACH
ORANGES
Overland Brand
IDAHO APPLES
PIONEER
ORCHARD
ROGUE RIVER VALLEY PEARS
SURE SHOT
MOUNTAIN
BARTLETTS
OPEN TRAIL
BARTLETT PEARS
49
SOS
ROGUE RIVER
PEARS
OPEN TRAIL
LUCKY TRAIL
APPLES
OUT WEST
WESTERN
WHITE ASTRACHAN
APPLES
OUR WEST
Westward Ho
Far West
NORTHWEST APPLES
1985


Gold-Nugget
BRAND
NEVADA COUNTY
MOUNTAIN FRUIT
GRAND PRIZE FOR BARTLETT PEARS
AWARDED TO NEVADA COUNTY OVER
ALL COMPETITORS AT THE
PANAMA PACIFIC INTERNATIONAL EXPOSITION
SAN FRANCISCO 1915
PANAMA-PACIFIC INTERNATIONAL EXPOSITION SAN FRANCISCO MCMXV
GRAND PRIZE
BEST AWARD
46 LBS. NET
PACIFIC FRUIT EXCHANGE
MAIN OFFICE
SAN FRANCISCO, CAL.

L·R
TRADE MARK REG. U.S. PAT. OFF.
Highest Quality
MOUNTAIN GROWN
FRUIT
3000 feet
elevation
MINIMUM NET WEIGHT
46 LBS. WHEN PACKED
HAND
GRADED
MACHINE
SIZED
Loma Rica Ranch
Grass Valley, California
Copyright 1926
by Loma Rica Ranch

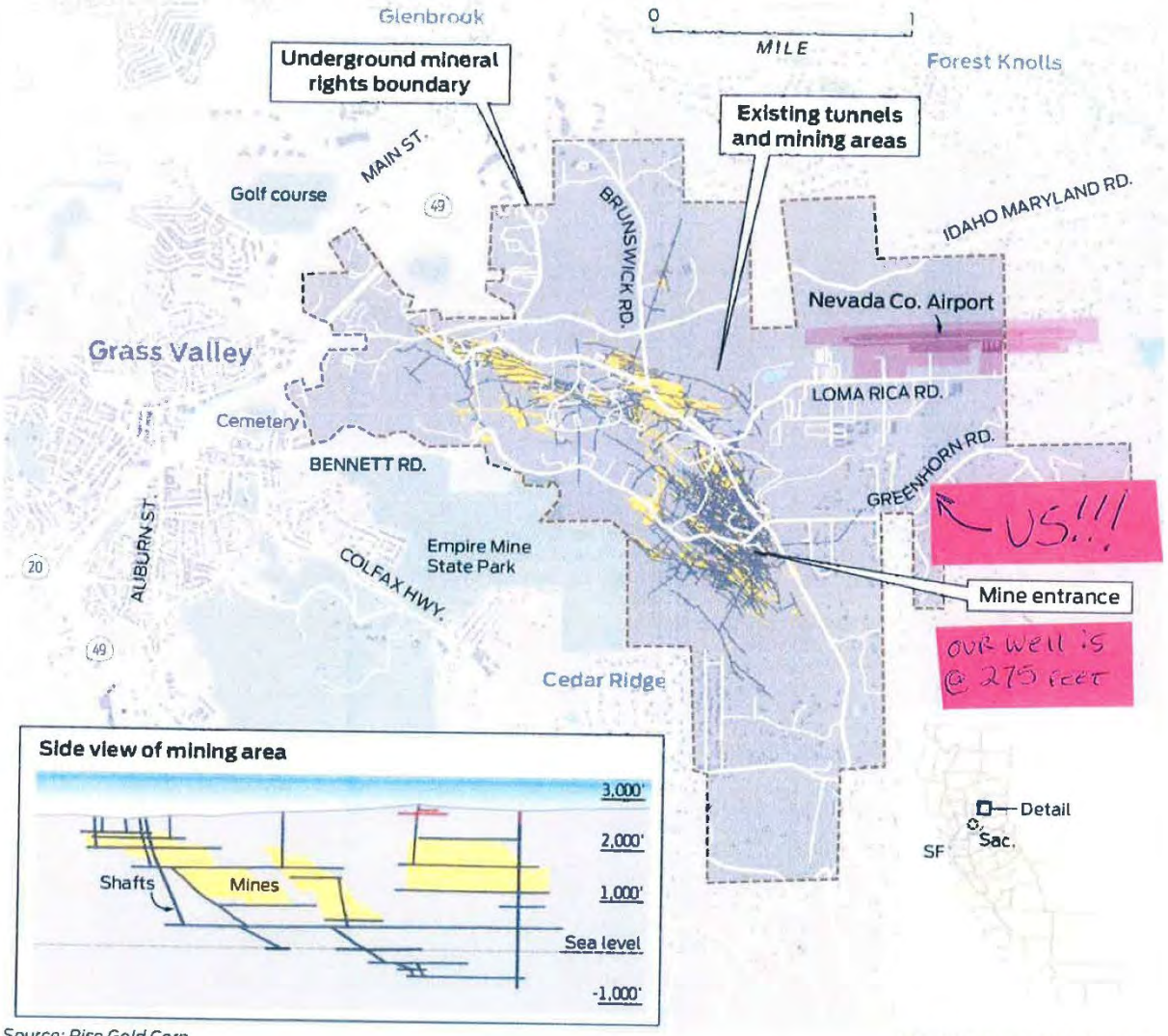

Lake Oroville
Downie
San Juan Ridge
NC
NEVADA CITY
14mi
GRASS VALLEY
GV
17mi
22mi
80
EAST
BEALE A.F.B.
Colfax
Foresthill
AUBURN
JACKSON
PLACERVILLE
NO. HIGHLANDS


T.17N.R.8E.
T.15N.R.8E.
T.15N.R.8E.
MAP OF
QUARTZ & PLACER MINE PROPERT
WITH
APPROXIMATE GEOLOGY
IN THE
GRASSVALLEY-NEVADAC
AND
ROUGH & READY
MINING DISTRICTS
IN
NEVADA COUNTY, CALIFORNI
IDAHO-MARYLAND
EMPIRE
MINES
NORTH
STAR
GRASS VALLEY
NEVADA CITY
Volcanic capping
Diabase
Slates
Serpentine
Gabbro
Granodiorite
← IDAHO-MD PROPOSED RE-OPENING
"1930 MAP"
"WATER IS A MINERAL."
"AFTER 100' THE RIGHTS CHANGE."
DEAD CENTER OF THE GRASS VALLEY MINING REGION!


MONTEZUMA HILL
Birchville
French Corral
S Yuba R
49
BY FLAT
HARMONY RIDGE
Owl Cr
Rush Creek
Nevada
Aqueduct
Lookout t
Hosp
The Oaks
Siphon
arr Meadows
Bear R
Pines
Rawlins
Chica
WOLF MT
Lookout
tower 2632
South Wolf Creek
Colfax
Indian R

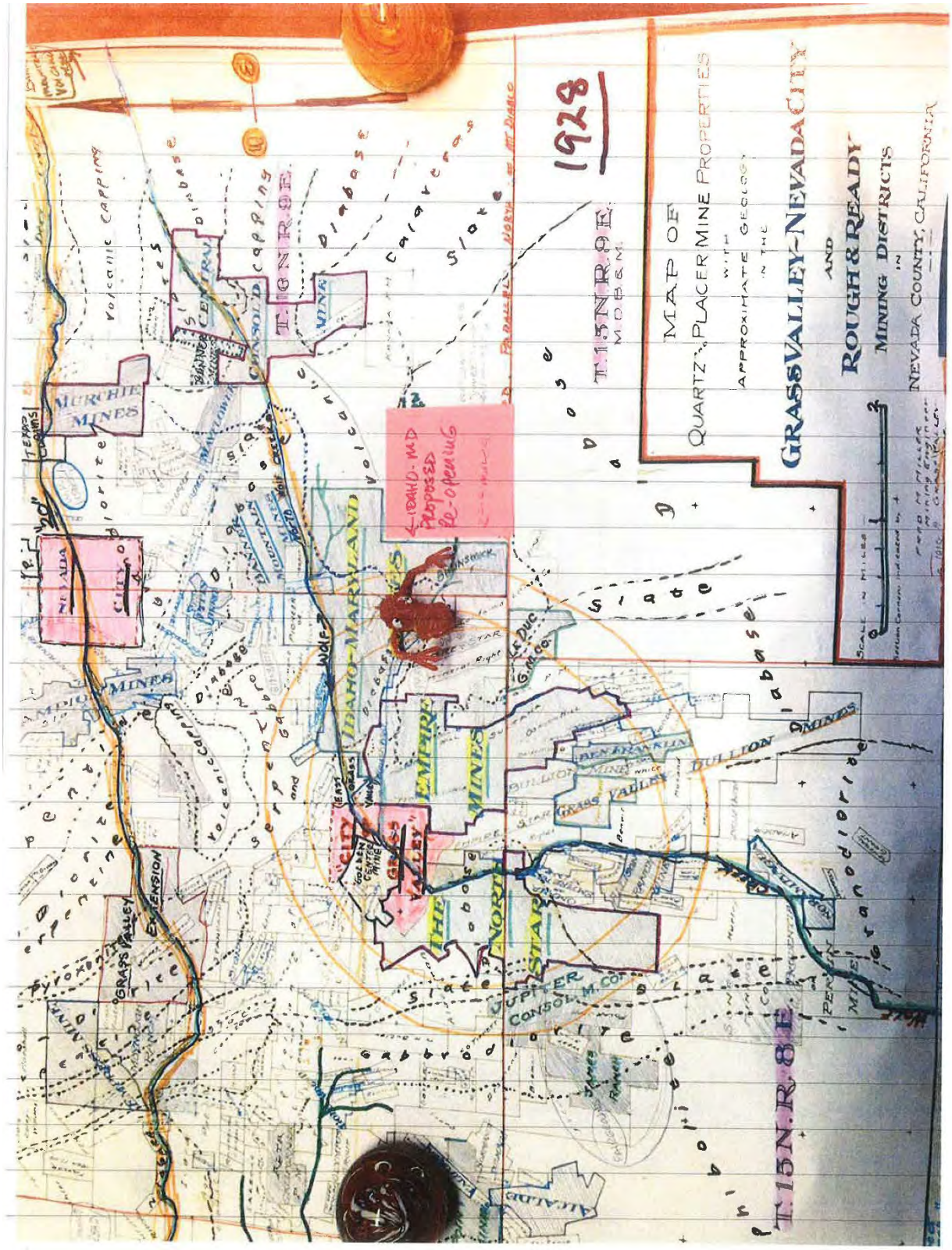
A new dig at the Idaho-Maryland Mine

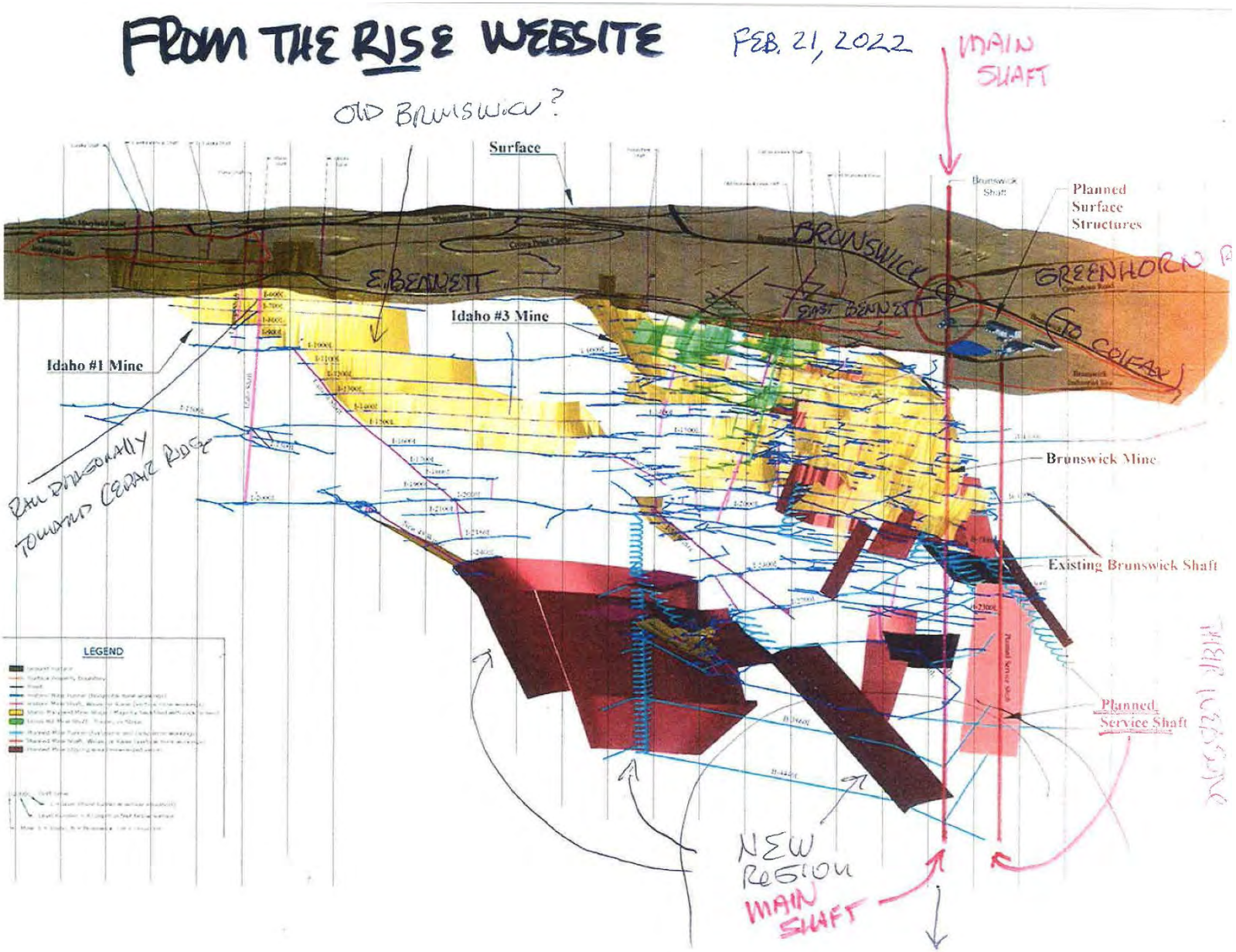
A mining company has recently acquired the land and mineral rights at the more than 150-year-old Idaho-Maryland Mine in Nevada County. The venture is seeking approval to reopen the facility and mine gold.



Source: Rise Gold Corp.

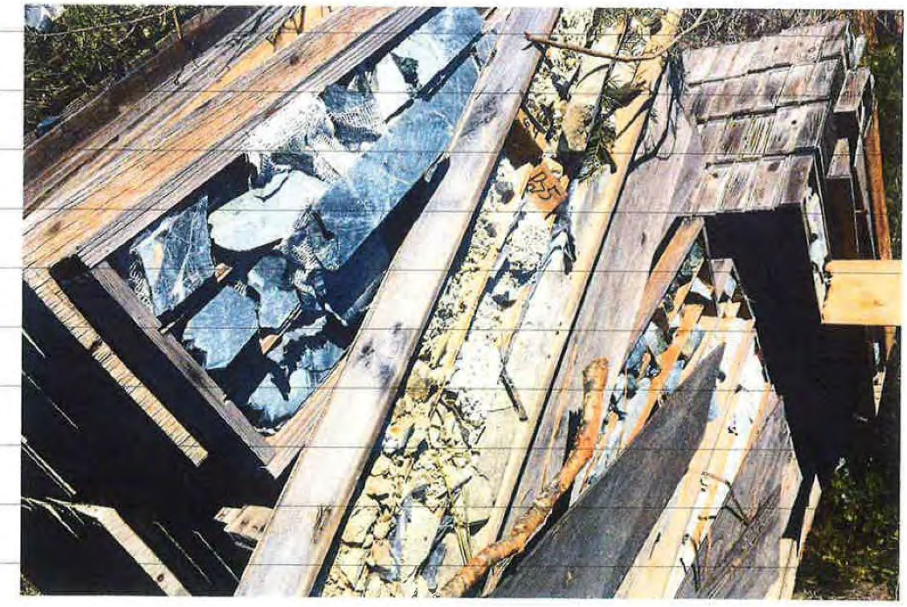
John Blanchard / The Chronicle


1928
MAP OF
QUARTZ & PLACER MINE PROPERTIES
WITH
APPROXIMATE GEOLOGY
IN THE
GRASS VALLEY-NEVADA CITY
AND
ROUGH & READY
MINING DISTRICTS
IN
NEVADA COUNTY, CALIFORNIA
T.16N.R.9E.
M.D.B.&M.
T.15N.R.8E.
IDAHO-MARYLAND
EMPIRE MINES
NORTH STAR
MURCHIE MINES
GRASS VALLEY
NEVADA CITY
BULLION MINES
GRASS VALLEY EXTENSION
Volcanic capping
Diabase
Slate
Gabbro
Serpentine
Porphyry
Quartz veins


FROM THE RISE WEBSITE
FEB. 21, 2022
MAIN SHAFT
OLD BRUNSWICK?
Surface
Brunswick Shaft
Planned Surface Structures
BRUNSWICK
E. BENNETT
WEST BENNETT
GREENHORN
TO COLFAX
Idaho #3 Mine
Idaho #1 Mine
RAIL DIAGONALLY TOWARDS CEDAR RIDGE
Brunswick Mine
Existing Brunswick Shaft
Planned Service Shaft
LEGEND
NEW REGION MAIN SHAFT

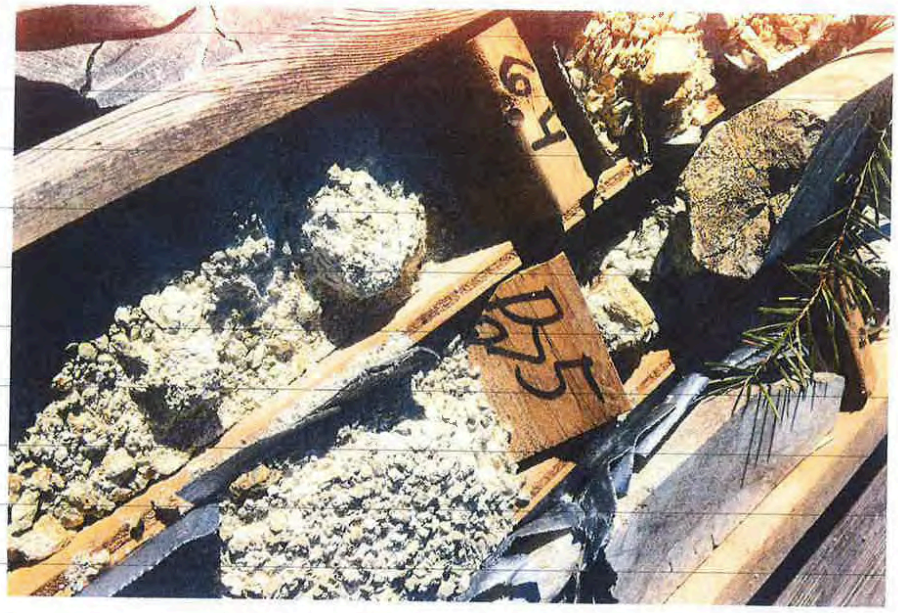
~~Jan~~ Feb 2022

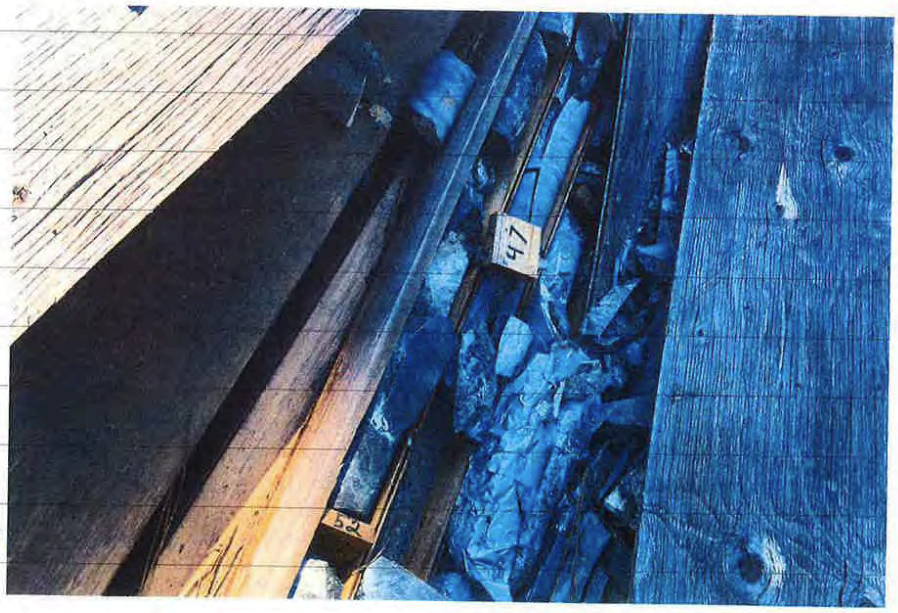
DISINTEGRATED HARD-ROCK, LEFT OUT
FOR PURPOSES TO JUST.



Jan 26 '22

DISINTEGRATED IN ONE YEAR



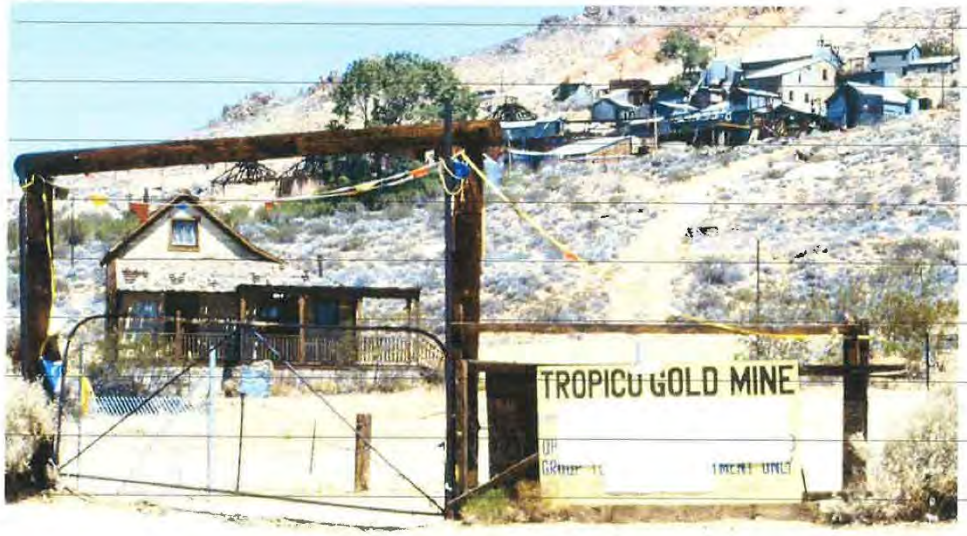


Com 47

How California's Gold Mining Past Is Threatening its Future

Thousands of underground mines across the state linger in toxic anonymity.
BECKI ROBINS March 27, 2019

In April 2006, 32-year-old Jason Chellew was relaxing in his Alta, California home when the ground opened up beneath him, swallowing him and most of his living room. It sounds like fiction, but what happened to Chellew was actually the last chapter in a series of historical events that started with the Marshall Gold Discovery on January 24, 1848, and ended when an old gold mine collapsed beneath Chellew's home, taking his life. The incident rattled a lot of Californians, who are mostly brought up to feel proud of the state's colorful gold mining history. No one likes to think that history is hazardous, but in California it's becoming increasingly difficult to hide from the real, if belated, consequences of the Gold Rush.



Tropico Gold Mine, Ghost Town, CA. The US Bureau of Land Management estimates that there are 47,000 abandoned mines in California. Photo by Don Graham.

The Bureau of Land Management estimates that there are 47,000 abandoned mines in California — mostly in the Sierra Nevada Mountains and Klamath Mountain regions of Northern California and the Mojave and Colorado Desert regions in Southern California — but no one really knows the exact number. Many mines were never recorded or mapped, and they could be anywhere — under any home or business, abandoned but covertly menacing. And collapsing mines aren't the only threat. Mining-related chemicals like lead, mercury, and arsenic are still hanging around in the soil and water in these areas, and the process of removing those chemicals is complex and expensive.

Michelle Fuller is the Water Treatment Operator at the Empire Mine State Historic Park in Grass Valley. She works on the Magenta Drain Passive Mine Water Treatment System, which was installed in 2011 to help the park address the problem of contaminants in the water — water that comes directly from abandoned, flooded underground tunnels. Fuller is a champion of the system, pointing out its components with enthusiasm, as if admiring a water sculpture instead of a series of plastic pipes and conduits.

The Empire Mine was once the most productive hardrock gold mine in the state — today it's a popular recreational destination. The locals bike, hike, and ride horses on the 856-acre park's 14 miles of trails. Couples get married on the lawn in front of the Cotswold-style "Empire Cottage," the ridiculously named two-story estate house made of stone and redwood. In the mine yard, visitors can peer into the gaping mouth of the old mine shaft, which vanishes into impenetrable darkness, beyond which lies 367 miles of tunnels.

The Empire Mine was a functioning gold mine from the Gold Rush through the 1950s. Arsenic occurs naturally in the wall rock and gold ore, and gold mining operations released the dangerous chemical into the waste rock and mine tailings (the debris that remains after the sediment has been picked over by miners). No one pulls gold out of the Empire Mine anymore, but chemicals from past mining activity still linger in the water and soil. In 2007, park officials discovered arsenic in the park's soils. When bikers and joggers kick up arsenic-containing dust on the dirt paths, it can become airborne, and that can pose a potential health hazard to park visitors. To make the trails safe again, Fuller says the arsenic hotspots were covered with natural material, but even that presented a problem — the material had to be obtained from outside the local area, because most of the rock and soil that could be purchased locally also had roots in California's gold mining past, and it often contained more arsenic than the hotspots did.

The arsenic settles into the water table, too. Many of the mine's lower tunnels are flooded, and during periods of heavy rain the water rises and leaves the mine, entering the above-ground water system. "The water I have coming through here," Fuller says, pointing to what looks like clear, drinkable water, "that's not groundwater, that's mine water."

Fuller and her team make sure that the water is clean when it leaves the park — the Magenta Drain is a chemical-free system of pumps, settling ponds, and wetlands. But the entire region outside of the park's boundaries is subject to the same or similar mining-related contaminants. North of the Empire Mine is an old hydraulic mining area called Malakoff Diggins — also a state park. Its central feature is a high canyon wall that looks like it belongs in another part of the solar system. Malakoff's brightly colored ponds and otherworldly geography are evidence of a sinister history — the canyon wall exists because half the mountain was washed away by the high-pressure jets of water miners used to release ore-containing sediment, and the ponds bear evidence of the chemicals that helped miners retrieve gold from that sediment. "All those ponds up there are emerald blue," says Fuller. "The miners used a lot of mercury up there. That's why it's all blue."

Mercury gets into the ground, too, and is absorbed by the vegetation. A 2007 study by the National Center for Atmospheric Research found that wildfires are a significant source of airborne mercury pollution. When dry, mercury-laden vegetation burns, the mercury becomes airborne and ends up in the atmosphere, where it remains until precipitation delivers it into the waterways. As California experiences longer periods of climate change-related drought, frequent wildfires, and the mercury contamination that goes along with them, will only become a more significant problem.

This pattern of mining-related environmental risk can be seen all over the nation — in 2015, Environmental Protection Agency workers investigating water levels at the 130-year-old Gold King Mine in Colorado's San Juan mountains inadvertently released 1 million gallons of contaminated wastewater into the Animas River, turning it a bright, toxic, mustard-yellow. Crews later confirmed that lead levels in the polluted waters were 100 times higher than what is considered safe, but lead isn't the only heavy metal in the spill — there's also arsenic, zinc, and copper. EPA officials say they plan to take tissue samples from deer to help them assess the actual damage to the region's wildlife population.

And then there are the sinkholes — rare, but still troubling. After a period of heavy rains in January of 2017, a sinkhole opened up behind a Grass Valley car dealership. Seven stories deep and 80-feet in diameter, the official

cause was the failure of a seven-and-a-half foot underground culvert, but plenty of residents thought there might be more to it than officials were letting on. Social media was full of speculation that the sinkhole was caused by a collapsed mine shaft, and with thousands of unmapped mines lurking underground, that's a pretty ominous theory.

Whatever the cause, sinkholes like these are a grim foreshadowing for what is certain to be a tumultuous future for California, which is expected to see longer, more devastating droughts followed by periods of heavy rains and flooding. Much of California's gold mining history still lurks beneath the surface, and while cleanup efforts like the Magenta Drain are critical initiatives, they only occur in known problem areas like the Empire Mine — leaving thousands of underground mines to linger in toxic anonymity.

The settling pond that is the heart of the Magenta Drain system is almost picturesque, with a fountain of water in the center and a pair of black and gray Canadian geese floating on the surface, oblivious to the heavy metals settling beneath them. The system is an impressive piece of engineering, but in the context of the whole state of California, it's a little bit like trying rebuild a war-torn city with one hammer and a handful of nails.

Fuller is clearly proud of the system's success, but even she acknowledges that it's just one small fix in an otherwise enormous statewide problem. The Gold Rush's footprint is broad, and the chemicals that linger in the ground call everything into question, even the safety of eating wild blackberries and the figs that grow in places with roots in California's gold mining past. "The list goes on and on," she says. "The miners left a mess behind all over California. It will take a lot to clean it all up."

(https://www.earthisland.org/journal/index.php/articles/entry/how-californias-gold-mining-past-is-threatening-its-future/) Becki Robins: Becki Robins is a freelance writer who lives with her family in rural Northern California. She writes about science, nature, and history.

"Gold mining is one of the most destructive industries in the world. It can **displace communities, contaminate drinking water, hurt workers, and destroy pristine environments**. It pollutes water and land with mercury and cyanide, endangering the health of people and ecosystems. - Google

"Will gold mining ever stop? Based on known reserves, estimates suggest that gold mining could reach the point of being economically unsustainable by 2050, though new vein discoveries will likely push that date back somewhat. "

What is Grass Valley famous for? During the goldrush countless tin miners immigrated from Cornwall, England and settled in Grass Valley to try their hand at gold mining Grass Valley, **home to two of the most lucrative mines in California: The Empire Mine and the North Star Mine**.

GRASS VALLEY, NEVADA COUNTY

"WHAT ARE THE 100 MOST COMMON USES FOR GOLD IN MODERN INDUSTRY!"
(AS OF FEBRUARY 27, 2022)

*(This is a hybrid document of dozens of website statements answering this question. I cannot site all the sources, but, google provided all of them.)

- Gold uses in everyday life (https://www.hellogold.com/6-gold-uses/) In the past 2,725 years.....
- Gold in electronics. As you know, gold is an excellent conductor of electricity. ...
- Gold in dentistry. Interestingly, gold was used in dentistry as far back as 700 B.C.! ...
- Gold in the medicinal industry. ...
- Gold in aerospace technology. ...
- Gold as awards and medals. ...
- Gold leaf and glassmaking.

Wealth protection and a financial exchange. One of the oldest uses of gold is for coins, and other financial assets. ...

ABSTRACT:
Approximately 11 percent of all gold produced is used in industry. Because of its inherent properties, gold is used in the **medical, electronics, automotive, defense and aerospace industries**. It is also increasingly used as a catalyst in many industrial processes. Gold has many medical applications.

Top 5 uses for gold
1) Wealth protection and a financial exchange. **One of the oldest uses of gold is for coins, and other financial assets. Purchased by governments, central banks, financial institutions and private investors, gold is used as a physical store of wealth. The rarity of the yellow metal has helped maintain its value throughout the ages. Golds ability to maintain value while other assets are dropping means it is stored, as pure gold bars and coins, in huge vaults – or under floorboards – for its investment value alone.**

The exact amount of gold bullion held for investment purposes is difficult to put an exact figure on. As well as national reserves, individuals can also own investment bullion. It is believed that the US holds the largest reserves but there has not been a physical full audit since Eisenhower's time in the 1950's. Germany is believed to have the second largest reserves but both Russia and China are adding to their stockpiles at an increasing rate.

2) Jewelry, adornments and medals. Jewelry, and other decorative gold products, account for the largest global use of gold. China and India are the two largest consumers, taking over half of all global production in 2018. In that year, over 1,200 tonnes of gold were consumed for jewelry in China, and over 500 tonnes in India. Whilst no doubt admiring the beauty and prestige of gold jewellery, many of these buyers will also have an eye to its investment value.This precious metal has historically been used as a symbol of luxury, superiority and wealth. Besides jewelry, gold is used to increase the value of a huge range of decorative items, such as medals and badges. Gold-leaf has traditionally enhanced artworks and, recently, artist Maurizio Cattelan has even exhibited a gold toilet in the Guggenheim museum in New York!

3) Electronics. Gold does not corrode, is a great conductor of electricity, and is highly resistant to heat. Physically, it is a soft, pliable metal and can be easily stretched or plated into thin coatings. For these reasons, gold is perfect to use in electronics, particularly for

cables and connectors. With consumer technology growing annually, there is increasing demand from the electronics industry, particularly in cell phones. In 2018, electronics consumed over 1,400 tons of gold, and in 2017, it accounted for 34% of gold used in the US.

4) Space exploration. Closely allied with electronic uses, space exploration and satellites are another growing consumer of gold. Besides the numerous electronic components, thin coatings of the metal are used in for shields and visors, and golds dependability is essential for the high-risk situation of space travel and exploration. Gold particles reflect infrared radiation from the sun, helping to keep temperatures down on darker panels and visors. Gold can also be used as a lubricant, and the volatility of organic lubricants makes them unsuitable to the extreme temperature ranges and high radiation of space.

5) Medicine and dentistry. Because it is non-reactive and non-toxic, gold has for many years been used in dentistry and medicine. New applications are being discovered every year, for example in prosthesis, where longevity is essential. Small amounts of gold are also **injected as a treatment for Rheumatoid arthritis and muscle damage,** and micro-particles are being used in the **treatment of some cancers.** Gold has even been used in Covid 19 tests!

"THE PRICE OF GOLD HAS ROCKETED DURING THE PANDEMIC, BUT MINING IT IS GETTING MORE DIFFICULT. CHRIS BARANIUK REPORTS ON CHALLENGES AND CONTROVERSY AT ONE OF THE UK'S BIGGEST PLANNED MINES."

"For 1,000 days, the caravan stood with banners and placards pinned to its side: "We are not afraid. This is our land. This is our home. We will die for it." Irish flags flutter in the wind. This is the **anti-gold mine protest site** set up by a group of locals in County Tyrone, Northern Ireland.

With 460 million-year-old veins of gold strewn hither and thither in the rock deep underfoot, the prospect of a mine in Curraghinalt, in a remote corner of the Sperrin mountains, has been talked about for decades – but it has never yet materialised. A recent application by a mining company to extract the seams of precious metal, has brought the prospect closer still. If successful, the firm says it could bring new jobs and money to the area. But many here want to keep things the way they are.

"I devote all my time to this campaign, I just feel it's our future," says Fidelma O'Kane, a retired social worker and lecturer who is concerned about the potential environmental impacts of the mine.

"My main worry is that the water will be poisoned, the air will be poisoned, the land will be contaminated – and ultimately people's health will suffer," she adds, explaining that she would never accept a mine, of any kind, in this area.

The company hoping to extract precious metals here, Dalradian Gold, says that it has put in place a swathe of environmental safeguards, and promises several economic benefits for locals. Still, **the online planning proposal for the mine** has attracted tens of thousands of comments, mostly negative, and a public inquiry will now take place to decide what will happen next.

Some in the nearby settlement of Gortin have objected to the planned gold mine (Credit: Alamy)

Heralded by some as a potential boon for Northern Ireland, where jobs and investment opportunities stagnated during the 30-year period of conflict known as the Troubles, experts say Curraghinalt could become home to the largest gold mine in the UK, were it to go ahead.

The question now hovering over the rolling Sperrins is, what is more valuable: keeping the gold in the ground, or taking it out?

This query could hardly be voiced at a more pivotal moment. The price of gold rocketed during the pandemic, spurring renewed interest in excavation projects and even an **illegal mining boom in parts of the Amazon rainforest**. Yet gold is proving ever-more difficult to release from the ground. The technical challenges may be well known, but environmental protests and local politics are less predictable. At what point does mining gold stop being worth the effort?

You may also like:

- **The controversial plan to fill a mine with nuclear waste**
- **Inside the hunt for a million-dollar haul of ocean gold**
- **The gold mine at the end of the world**

Last year, global gold production fell by 1%, the first decline in a decade, according to the World Gold Council, which promotes the gold industry. Some analysts argue we have reached "peak gold" – which means that the maximum rate of extraction has passed and the production of gold will continue to fall until, eventually, mining for it shall cease entirely. However, demand for the stuff shows no sign of slowing down.

"It's kind of a perfect storm," says Matt Miller, vice president of equity research at CFRA Research, an investment analysis company. "Or, a better way to say it is, the fundamentals for gold may never be stronger than they are now." According to CFRA, about half of the world's gold, excluding that still buried in the ground, is used in jewellery. As for the other half, one quarter is held by central banks and a final quarter is owned by private investors or used in industry.

Miller is among those who believe we have reached peak gold. The price of a single ounce of the glittering yellow metal breached $2,000 (£1,550) this summer and still rests comfortably above $1,900 (£1,470). Twenty years ago, the same ounce would sell for less than a quarter of that amount. The latest surge, following the emergence of Covid-19, has been linked to weakening currencies, including the US dollar. Governments are borrowing huge sums to pay for their pandemic response plans and printing money to fill the gap, say analysts, which means that the value of currency has become more volatile. Gold on the other hand is viewed as a stable asset, of which there are finite amounts, meaning that investors deem it trustworthy.

But Covid-19 has also caused disruption to gold mining operations themselves and supply is not likely to bounce up to meet rising demand any time soon. As such, the gold mining industry is actually sitting on the makings of a "major crisis", argues Miller. "My view is that gold demand will continue to trend upwards," he says. "More and more of that is going to come from the recycling, which basically means that gold is trading hands."

He predicts that recycling old jewellery, coins or even the seemingly miniscule amounts of gold in the circuit boards of electronic devices, will become an increasingly significant source of the metal in the future. CFRA's data suggests that around 30% of the world's gold supply in the past 20 years was actually recycled, not mined. Refineries that recycle "scrap" gold – old jewellery, coins and bars – do use toxic chemicals and energy in their processes, but some environmental impacts may be much lower than mining. **One recent study of gold refineries in Germany** found that, kilogram for kilogram, the production of 99.99% pure gold via recycling was 300 times less carbon intensive than mining it from underground or open pit mines.

This means that obtaining one kilogram of recycled gold would produce 53kg of CO_2 equivalent – but to mine a kilogram of the same material would cause 16 tonnes of CO_2 equivalent to be emitted. Recycling scrap gold from electronics fell in between the two but was still better than mining – at one tonne of CO_2 equivalent for every kilogram of gold turned out.

Like any large-scale industrial operation, gold mining can also have local effects on the environment. Public opposition to gold mines in some parts of the world has become a barrier to gold production, says Miller. Such resistance does not only exist in Tyrone. Take the Pascua-Lama mine in Chile, for instance. **After years of protests from local activists on environmental grounds**, the project was halted by regulators.

Gold is in high demand, but supply from mines is dwindling (Credit: Charles O'Rear/Getty Images)

But where gold mines have become established, they can become giant operations. **The world's largest** produce many tonnes of gold annually and the biggest of them all, Nevada Gold Mine in the US, churns out more than 100 tonnes every year. Even smaller gold mines can support the livelihoods of many people within the communities that bloom around them. Take the city of Val d'Or (Valley of Gold) in Quebec, Canada. There's been a town there ever since gold was discovered in 1923. Various other metals including copper and lead are now also extracted in the area and a surplus of mining jobs has **attracted people to Val d'Or in recent years**. The town's ice hockey team, the Foreurs, even has a **mascot with a hard hat named "Dynamit"** – a reference to the dynamite used to blast away rock in mining.

Political barriers As for Curraghinalt, it was bloodshed that kept the gold in the ground for many years. During the Troubles, several political and sectarian groups in Northern Ireland turned to violence, carrying out shootings and bombings, for example. So when one company eyed the potential for a mine at

Curraghinalt in the 1980s, it struggled to obtain a permit for explosives, given the security risks of keeping them on-site at the time. But a decade later, Curraghinalt seemed to promise a more hopeful future, remembers **Adrian Boyce**, professor of applied geology at Scottish Universities Environmental Research Centre. Around the time of the Good Friday Agreement (the political accord signed in April 1998 that helped bring an end to the Troubles), Boyce and colleagues took part in an initiative to study the geology of Curraghinalt and assess its commercial potential. "It was really a fresh hope for the people of Northern Ireland and that's the impact that I saw for it," he recalls. "At a time when, you know, not a lot of people were investing in Northern Ireland."

He mentions the Omagh bombing, in which a group calling itself the Real IRA detonated a car bomb on a Saturday afternoon in August 1998, killing 29 people, including a woman who was pregnant with twins. Omagh is a 20-minute drive from Curraghinalt. In the minds of some, the economic opportunities of a brand new gold mine offered Northern Ireland a chance to escape the horrors of the past – and still offers the local area economic hope for the future.

After protestors objected to Dalradian's proposed use of cyanide, the company dropped that plan (Credit: Alamy)

Back in the 1990s, it was the price of gold that ultimately stymied the mine's prospects, says Boyce. But that is no barrier now. And, he says, the size of the mine – Dalradian estimates it could produce 130,000 ounces (4 tonnes) annually for 20 years or more – makes it unique in the UK.

"For gold, Curraghinalt is far and away the biggest gold mine that's ever been found in the UK," says Boyce. "It dwarfs everything else."

Yet the story of Curraghinalt speaks to the challenges of industrial gold mining in 2020, especially when operating near existing communities in an area of natural beauty. The mine is situated in a fairly remote part of Northern Ireland surrounded by farms and wilderness. Omagh, for instance, has a population of fewer than 20,000 people.

Since 2009, Dalradian has been excavating samples from below ground at its site in Curraghinalt while promoting plans for the mine to locals. The proposals include building an underground mine, rather than an open pit-style project, and extracting ore that would be processed partly in Tyrone, partly overseas.

Following fierce opposition, in 2019 Dalradian **dropped its plan to use cyanide at the site**. In some gold mining operations, solutions containing cyanide are used to dissolve gold from ore mined out of the ground so that the metal can be extracted and collected. Dalradian also says it has reduced water usage by 30% and gas emissions by 25% as part of its aim to become Europe's first carbon neutral mine.

But campaigners continue to express concerns that chemicals could be washed into nearby rivers and harm local wildlife. Pollution from the mine could also negatively affect people's health, they claim. And they also fear that a large heap of "tailings" – waste material extracted from the mine and left aboveground – would blight the area's scenery.

BBC Future had arranged to tour Dalradian's site in Tyrone but the company cancelled the visit two days before it was due to take place without explanation.

In a statement, a spokesman for Dalradian said: "This is a safe and environmentally responsible project which will emulate the successes of other modern mines in Europe."

The company says it has listened to the community, offering tours and changing its mining processes when concerns were raised.

"People can also be assured that the project is being scrutinised by an independent, robust planning process and that it has been designed to meet exacting standards. We've held around 100 meetings with

regulators so far and the local Public Health Agency has made no objection to the project on public health grounds."

And regarding the tailings: "The dry stack will have an average thickness of 17m (56 feet), will be replanted during operations, is located in a natural hollow and will be blended into the local landscape."

Human activity in the Sperrins dates back thousands of years (Credit: Alamy)
In a recent application for permission to discharge materials including heavy metals into a nearby stream, Dalradian also mentioned corrosive substances such as sulphuric acid and sodium hydroxide. On this point, the spokesman said, "Although it's not expected that they will be used routinely, as they will be stored on-site they must be listed in the discharge consent."

A treatment plant would be used for water management, he added, and noted that the mine offered a "massive opportunity" at a time when Northern Ireland's economy faced uncertainty over Brexit.

While campaigners like O'Kane say they will not accept the mine under any circumstances, there are certainly some who would. It is difficult to get a sense of exactly how many in Tyrone are for or against. The Northern Ireland Department for Infrastructure planning portal contains more than 41,000 public comments about Dalradian's proposals, more than 90% of which are objections. When asked by BBC Future why many of these responses appeared to be duplicates, the department said it believed the figures were an "accurate summary" of representations received.

Duplicates can arise for a number of reasons, a spokesman said: "They can relate to individuals making a representation on more than one occasion given there has been various amendments to the proposal."

With a public inquiry now looming over the plans, it's up to the authorities to investigate and represent the interests of local people before coming to a decision about whether the works ought to go ahead, suggests Boyce. "Let the politicians do what politicians are paid to do," he adds.

In recent years, across the Irish Sea in Scotland, local objections were raised over plans for a different mine, at Cononish, in Loch Lomond National Park. Boyce notes that environmental concerns were voiced there, too, but ultimately the project gained support and was granted planning permission. The first gold from the mine **could be produced as early as November**.

A mine at Curraghinalt that proved to be productive would certainly attract interest from investors, argues Chris Mancini, a research analyst at Gabelli Gold Fund, which invests in gold. And he argues that it would be safe, environmentally speaking.

But it won't do for some. For Fidelma O'Kane and her fellow campaigners, the mine has become anathema – a threat to the very character of the place where they live.

"The area is a beautiful area, it's designated an Area of Outstanding Natural Beauty," insists O'Kane. "We don't want it industrialised with heavy industry. "The clean, green image of our country would be gone forever."

Whatever happens next at Curraghinalt, there's no doubt that Dalradian's efforts have sparked many discussions locally about what people would be willing to accept. It's the sort of debate that could well become more common if the price of gold remains high and companies seek out small but nonetheless lucrative gold deposits in places that may have little or no tradition of gold mining. Then again, if we really have reached peak gold, the rush might not last very long." (END)

SMITHSONIAN MAGAZINE (https://www.smithsonianmag.com/science-nature/environmental-disaster-gold-industry-180949762/)

SCIENCE

The Environmental Disaster That is the Gold Industry -- The mining industry has had a devastating impact on ecosystems worldwide. Is there any hope in sight? -- BY LASTAIR BLAND, FEBRUARY 14, 2014

(The 13,000-foot high Grasberg mine contains the largest single gold reserve in the world, and the largest copper deposit as well. © George Steinmetz/Corbis) PHOTO CREDIT

TEXT: A global campaign to boycott what activists are calling "dirty gold" gained its 100th official follower three days before Valentine's Day.

The pledge was launched in 2004 by the environmental group Earthworks, which has asked retail companies not to carry gold that was produced through environmentally and socially destructive mining practices. Eight of the ten largest jewelry retailers in the United States have now made the pledge, including Tiffany & Co., Target and Helzberg Diamonds. The No Dirty Gold campaign is anchored in its "golden rules," a set of criteria encouraging the metal mining industry to respect human rights and the natural environment.

While the list of retailers aligned in their opposition to dirty gold continues to grow longer, most gold remains quite filthy. The majority of the world's gold is extracted from open pit mines, where huge volumes of earth are scoured away and processed for trace elements. Earthworks estimates that, to produce enough raw gold to make a single ring, 20 tons of rock and soil are dislodged and discarded. Much of this waste carries with it mercury and cyanide, which are used to extract the gold from the rock. The resulting erosion clogs streams and rivers and can eventually taint marine ecosystems far downstream of the mine site. Exposing the deep earth to air and water also causes chemical reactions that produce sulfuric acid, which can leak into drainage systems. Air quality is also compromised by gold mining, which releases hundreds of tons of airborne elemental mercury every year.

Gold has traditionally been a gift of love, and, not surprisingly, jewelry sales spike around Valentine's Day. According to a recent survey released by National Jeweler, about 20 percent of Americans who planned to give a Valentine's Day gift this year said they would be buying jewelry—sales estimated to total about $4 billion. Thus, activists see Valentine's Day as a prime opportunity to educate consumers and stifle the trade of dirty gold. Payal Sampat, Earthworks' director of the No Dirty Gold campaign, wants consumers to understand the back story of the gold industry. This, she believes, would spur an improvement in mining practices.

"We believe gold and metal mining can be done much more responsibly," Sampat says. "It's feasible, but consumers need to think about the impacts they have when they buy jewelry."

But the demand for gold is tremendous now. Several months ago, gold's value hit $1,800 an ounce. It has since dropped to roughly $1,300—though that's still five times its price in the late 1990s. The money to be made at all levels of the industry, from laborers knee-deep in mud to executive officers reaping thousands of dollars a day, creates powerful incentive to find gold, even though doing so may now be harder than ever. Alan Septoff, communications manager for the No Dirty Gold campaign, says that easily accessible

gold has become scarcer and scarcer through time. "What we have left in most mines is very low-quality ore, with a greater ratio of rock to gold."

This, he explains, makes the energy required to mine that gold—and the waste and pollution produced in the process—proportionally greater and greater. In other words, dirty gold is only getting dirtier. What's more, gold that cannot be traced back to some level of deforestation, air and watershed pollution, and human injury and death is virtually nonexistent, according to Septoff. "There is no such thing as clean gold, unless it's recycled or vintage," he says.

But James Webster, the curator of mineral deposits at the American Museum of Natural History, says the story is not as dark and one-sided as some may spin it. A clean gold mining industry is indeed possible, he says. Moreover, the industry is not as destructive at it may seem. Some states have strict—and effective—regulations on the handling of mine waste and runoff, Webster says. "Cyanide is not as nasty/scary as it may sound," he wrote in an email. "Its half-life is brief in the presence of sunlight."

Yet the Environmental Protection Agency has reported that 40 percent of watershed headwaters in the western United States have been contaminated by mining operations. Many of these are tiny sites, and there are, overall, roughly 500,000 defunct metal mines in 32 western states that the EPA has plans to clean up. Remediation of these sites may cost more than $35 billion.

One of the largest open pit mines is located near Salt Lake City—the Bingham Canyon Mine. The deepest mine in the world, it is about 4,000 vertical feet from its rim to the bottom. Bingham Canyon is known as a copper mine, but the site yields gold, too. More than 600 tons of gold have come out of the mine since its opening in 1906, and every year, $1.8 billion worth of metals are produced here.

Another infamous American mine is the Berkeley Pit, in Montana. This mine made the nearby town of Butte rich and prosperous for a time, but the site was eventually exhausted of riches—including copper and gold—and retired. In the decades since, water has seeped into the Berkeley Pit and filled the mine, and today it contains one of the most lethally polluted lakes in the world. The toxic, acidic water killed 342 snow geese that landed here in 1995. The water, many people fear, will eventually taint the region's groundwater supply.

The Grasberg Mine, in Indonesia, is one of the largest gold mines in the world and is owned by American company Freeport McMoRan. The Grasberg Mine is also located smack in the middle of Lorentz National Park, creating such a huge scar on the Earth that can be seen from space. The mine dumps about 80 million tons of waste debris into the Ajkwa river system every year, according to Sampat at Earthworks. Another American company, Newmont, owns the Batu Hijau mine, also in Indonesia. This operation dumps its waste into the ocean near the island of Sumbawa.

While the EPA struggles to remediate and restore almost countless mine sites in the United States, and while activists work to stem the tide of demand on the gold industry, efforts are underway to develop more open pit mines. Among the most controversial is the Pebble Mine, proposed for Alaska's Bristol Bay region. The project, critics say, could destroy or seriously damage unspoiled wilderness, wildlife habitat, indigenous cultures and the region's sockeye salmon fishery. Of the Pebble Mine, Septoff at Earthworks said, "There could not be a clearer example of a short-term profit gained at a long-term loss."

The road ahead for the Pebble Mine's proponents will not likely be a smooth one. A major investor in the project backed out late last year, and the jewelry industry—which uses about half of all gold mined each year —has expressed opposition to the project. Several days ago, Tiffany & Co.'s chairman and CEO Michael Kowalski told JCK Magazine that developing the Pebble Mine site will almost certainly do more damage than it's worth to the environment, the region's salmon-based economy and the face of the gold

industry itself. "The possibility of this ending in disaster is so high, it's hard to see how any mining company could go forward," Kowalski told JCK.

The EPA released a report in January in which the agency said development of the mine would carry many risks of damage to the ecology and culture of the region. There is an activist slogan that says, "The more you know, the less gold glows."

But ethical, responsibly mined gold may actually be possible. It has been estimated that about 165,000 metric tons of gold have been mined in all of human history. Most of this gold is still in circulation—and a growing number of jewelers are making use of this material. Brilliant Earth, Leber Jeweler and Toby Pomeroy are three companies that have abandoned new gold and opted,instead, to only deal in recycled and second-hand material, thereby cutting mining out of the equation.

Beth Gerstein, co-founder of Brilliant Earth, based in San Francisco, says there have long been "inconsistencies" between the traditional perceived value of gold as a romantic symbol and the realities of extracting raw gold from the Earth.

"Jewelry is a symbol of commitment and values and we want this to be true inside and out," Gerstein said.

Gerstein, along with her business partner, launched Brilliant Earth in 2005, and she says demand for recycled gold has grown since the beginning.

"Consumers want to know that the product they're buying hasn't had a negative impact on the world," Gerstein said. The gesture of recycled precious metals seems a virtuous one, and public interest in supporting the effort seems to reflect goodwill. But Webster, at the American Museum of Natural History, says that recycling gold has so far done little to offset the destruction of mining.

"Unfortunately, the demand for gold, annually, far exceeds the amount recycled," he wrote. He even feels that applying any symbolic or superficial value to gold, whether recycled or fresh from an open pit mine, is ultimately only furthering the problems linked to much of the mining industry: "To me, it is interesting that because the majority of gold that is mined and extracted from ores is directed to the jewelry industry (an enterprise that societies might be able to survive with less of), we could run societies on Earth with much less gold mining." - End.

Alastair Bland -- Alastair Bland is a journalist based in San Francisco who writes about the environment, agriculture, science and food.

Gold Mining and the Environment

Dirty gold mining has ravaged landscapes, contaminated water supplies, and contributed to the destruction of vital ecosystems. Cyanide, mercury, and other toxic substances are regularly released into the environment due to dirty gold mining.

(1) Toxic Waste

Modern industrial gold mining destroys landscapes and creates huge amounts of toxic waste. Due to the use of dirty practices such as open pit mining and cyanide heap leaching, mining companies generate about 20 tons of toxic waste for every 0.333-ounce gold ring. The waste, usually a gray liquid sludge, is laden with deadly cyanide and toxic heavy metals.

Many gold mines dump their toxic waste directly into natural water bodies. The Lihir gold mine in Papua New Guinea dumps over 5 million tons of toxic waste into the Pacific Ocean each year, destroying corals and other ocean life. Companies mining for gold and other metals in total dump at least 180 million tons of toxic waste into rivers, lakes, and oceans each year—more than 1.5 times the waste that U.S. cities send to landfills on a yearly basis.

To limit the environmental damage, mines often construct dams and place the toxic waste inside. But these dams do not necessarily prevent contamination of the surrounding environment. Toxic waste can easily seep into soil and groundwater, or be released in catastrophic spills. At the world's estimated 3,500 dams built to hold mine waste, one or two major spills occur every year.

Toxic waste spills have had devastating consequences in Romania, China, Ghana, Russia, Peru, South Africa, and other countries. In 2014, a dam collapsed at the Mount Polley gold and copper mine in British Columbia, sending about 25 million cubic meters of cyanide-laden waste into nearby rivers and lakes—enough to fill about 9,800 Olympic-sized swimming pools. The spill poisoned water supplies, killed fish, and harmed local tourism.

Further Reading Smithsonian.com: The Environmental Disaster That Is the Gold Industry
New York Times Beyond Gold's Glitter: Torn Lands and Pointed Questions
BBC One year on: Romania's cyanide spill

(2) Acid Mine Drainage

Dirty gold mining often leads to a persistent problem known as acid mine drainage. The problem results when underground rock disturbed by mining is newly exposed to air and water. Iron sulfides (often called "fool's gold") in the rock can react with oxygen to form sulfuric acid. Acidic water draining from mine sites can be 20 to 300 times more concentrated than acid rain, and it is toxic to living organisms. The dangers increase when this acidic water runs over rocks and strips out other embedded heavy metals. Rivers and streams can become contaminated with metals such as cadmium, arsenic, lead, and iron. Cadmium has been linked to liver disease, while arsenic can cause skin cancer and tumors. Lead poisoning can cause learning disabilities and impaired development in children. Iron is less dangerous, although it gives rivers and streams a slimy orange coating and the smell of rotten eggs.

Once acid mine drainage starts, it is difficult to stop. Acidic waters flowing from abandoned mines can raise acidity levels and destroy aquatic life for generations. Roman mining sites in England are still causing acid mine drainage more than 2000 years later.

Further Reading New York Times As Gold Mine Prepares to Close, Montana Argues Over a Hole in the Ground

(3) **Mercury Pollution**

The use of mercury in gold mining is causing a global health and environmental crisis. Mercury, a liquid metal, is used in artisanal and small-scale gold mining to extract gold from rock and sediment. Unfortunately, mercury is a toxic substance that wreaks havoc on miners' health, not to mention the health of the planet. For every gram of gold produced, artisanal gold miners release about two grams of mercury into the environment. Together, the world's 10 to 15 million artisanal gold miners release about 1000 tons of mercury into the environment each year, or 35 percent of man-made mercury pollution. Artisanal gold mining is actually among the leading causes of global mercury pollution, ahead of coal-fired power plants.

When mercury enters the atmosphere or reaches rivers, lakes, and oceans, it can travel across great distances. About 70 percent of the mercury deposited in the United States is from international sources. Still more mercury reaches the United States through imported fish. Once it reaches a resting place, mercury is not easily removed. Sediments on the floor of San Francisco Bay remain contaminated with mercury left by the California gold rush of the 19th century.

Mercury is extremely harmful to human health. The amount of vapor released by mining activities has been proven to damage the kidneys, liver, brain, heart, lungs, colon, and immune system. Chronic exposure to mercury may result in fatigue, weight loss, tremors, and shifts in behavior. In children and developing fetuses, mercury can impair neurological development.

Further Reading Reuters Mercury Poisoning, the Dark Side of Colombia's Gold Boom
Associated Press Mercury in gold mining poses toxic threat

(4) Destroying the Amazon

A gold mining boom is accelerating the destruction of the Amazon rainforest, a biologically diverse ecosystem that acts as a check on global warming. Artisanal, or small-scale, gold miners are tearing down the forest to access the rich gold deposits beneath. One study found that deforestation rates in the Madre de Dios region of the Peruvian Amazon have increased six-fold due to gold mining.

Gold mining is also responsible for releasing large amounts of mercury into the Amazon's air and water. The mercury is poisoning plants, animals, fish, and people. In one city in the Peruvian Amazon, unsafe mercury levels were recorded in 80 percent of local residents. The gold mining boom does not bode well for the Amazon or the people, both locally and globally, who depend on it.

Further Reading Discovery News As Gold Prices Go Up, Forests Are Coming Down
Mining.com Mercury pollution linked to illegal gold mining in Peru reaches lethal levels

ARTICLE SOURCE: https://www.brilliantearth.com/gold-mining-environment/#:~:text=Cyanide%2C%20mercury%2C%20and%20other%20toxic,due%20to%20dirty%20gold%20mining.

Heavy Metal Pollution from Gold Mines:

Environmental Effects

1. Introduction; Increased urbanization and industrialization have led to large amounts of toxic contaminants being released into the environment worldwide. Some of these contaminants occur naturally, but anthropogenic sources, especially mining activities, have contributed significantly to their increase. Although mining provides enormous social and economic benefits to nations, the long-term adverse effects on the environment and public health cannot be overlooked [1].

Mining, mineral processing and metallurgical extraction are the three principal activities of gold mining industries which produce wastes. Mineral processing also known as beneficiation aims to physically separate and concentrate the ore mineral(s) using physical, chemical and sometimes **microbiological techniques.** Metallurgical extraction breaks the crystallographic bonds in the ore mineral in order to recover the desired element or compound [2]. Large quantities of waste are produced during this activity, particularly in gold mines which release over 99% of extracted ore as waste to the environment [3].

The use of bacteria in gold extraction, **known as biomining,** has received considerable attention due to the potential roles played by these bacteria in the recovery of gold from gold-bearing ores. Acidophilic, chemolithotrophic iron and sulphur oxidizing bacteria such as *Acidithiobacillus (At.) ferroxidans*, *At. thioxidans*, *Leptospirillum (L.) ferriphilum* and *L. ferroxidans*, *Sulfobacillus acidophilus Sulfolobus metallicus* have been identified and utilized in gold extraction. These bacteria help in solubilizing the sulphide matrix of the gold deposits thereby making the gold more reachable to leaching by the chemical lixiviants [4,5,6]. Biomining is known to be more environmentally friendly than many physicochemical extraction processes. In addition, the wastes generated using bacteria are less biologically reactive compared to those obtained using the physicochemical methods [5].

Tailings are the major wastes produced from gold extraction and they contain high amounts of heavy metals (HM). These metals leach out in an uncontrolled manner into surrounding environments on exposure to water or through dispersal by wind. The presence of elevated concentrations of HM in the environment is a serious health issue worldwide due to their non-degradative nature which makes them persistent and thereby exert long-term effects on the ecosystem [7]. Heavy metals affect the natural population of bacteria in the soils. This leads to loss of bacterial species responsible for nutrient cycling with a consequent negative effect on ecosystem functioning [8]. To survive in metal polluted sites, some bacteria have devised various ways to withstand the potentially deleterious conditions. They are known to develop and adopt diverse detoxifying mechanisms such as biotransformation, bioaccumulation and biosorption which can be utilized in either ex-situ or in-situ bioremediation of HM polluted sites [9]. This review focuses on environmental impacts of increasing heavy metal pollution caused by gold mining activities on human health and the environment and how bacteria interact with these metals. ... (For more detail... https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5129257/)

"During the U.S. gold rush, hydraulic mining operations in California completely denuded forested landscapes, altered the course of rivers, increased sedimentation that clogged river beds and lakes and released enormous amounts of mercury onto the landscape. California wildcat miners used an estimated 10 million pounds."

MY VISITS WITH SAM MacGREGOR, SHEET METAL FABRICATOR OFF LOMA RICA ROAD. He is a third generation miner in specifically the Nevada County mining industry.
12/15?//21 AND BEYOND
REGARDING TOXIC MINERALS/CHEMICALS IN LOCAL GOLD MINING HISTORY, REGIONAL MINING HISTORY, AND HIS FAMILIES ROLE IN IT, AND MYRIAD OTHER SUBJECTS.

[SAM MacGREGOR, sheet metal friend on Loma Rica, who gave me the 1928 map, in 2021-22, "Asbestos is in ~~ALL that material~~" ~~referring to the vandalized containers of core samples photographed in January on the mine~~ property. Pat] --- I hung-out with him about 20 times for an hour or more. He is a third generation local, and mining enthusiast. He is a WEALTH OF INFORMATION! (Take that recommendation from me, a 45 years CA historian and author!). I did not record all our chats and visits before he closed hi metal-shop and moved. But he is pleasant, and DEEPLY knowledgeable about all things regional GOLD! He is a walking encyclopedia! -- Pat

I stumbled across him, looking for some sheet metal work. He had gold quartz on his counter, which lead us to many hours of conversation over several weeks. He gave me this map to go and copy, on the day I met him. I made copies for myself and him, and delivered his original back to him an hour later. Then, I started studying and colorizing my own copy. MANY afternoons, I stopped by his shop and we talked for half-an-hour to three hours. Then, he told me he was closing the sheet-metal shop, selling -off everything and moving. I have picked his brain every since. Nice person, amazing brain, he has taken "20 geologists at a time throughout the county and showed them what I know!." He is, in my historical-service opinion, and AMAZING MAN AND HAS A FORMIDABLE MEMORY AND INTELLECT!!! Patio (2/26/22)

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(WE SPOKE UNRECORDED AND NOT-NOTED IN MY FILES, TWENTY TIMES AT LEAST, FOR uncountable HOURS BEFORE FEB 24. I just didn't keep notes. But, he is a wealth of three-generations of localized gold mining history, who has "Over the years, taken 20 geologists on trips through the mines and mining regions in Nevada County." (Patio)

Feb 24, 2022 After reviewing and commenting on my list of mining hazards, he exclaimed, "All these are pretty safe in tiny quantities. But , after digging, blasting, grinding, and moving it to the stamp mills or leach ponds, or ~~even underground processing, ALL of the inert and concealed elements and compounds come out as separated dust~~ and 'grounds' and get hydrated and are therefore no longer inert, especially after they are removed from the mine to the open surface, where water, air, treatment ponds, and such, release their collective toxic materials into the air and water out on the surface, and will travel all the drainage routes, as well as the local wind, to the very end where they concentrate as the end-water evaporates. So, when they say it's all 'safe', that is only as long as they remain in the solid rock. The mining in the tunnels and sending the ore to the surface for processing, is where the big problems start. " "Miners and workers have to handle, breath, and process it with a lot of abatement processes, wearing suits,

and monitoring levels around the mine areas. It's NOT like a hundred years ago. Miners are near and IN these things and they absorb amounts of it by working near it. There is a difference between the standard healthy-levels of some elements we all have in our bodies like zinc, magnesium..." (!), and those that can adversely affetc the human body and human health, basically, overdoses or unhealthy amounts." (1) In acceptable levels, oxygen, carbon, hydrogen, nitrogen, calcium, phosphorus are the most abundant elements found in the human body, followed by potassium, sulfur, sodium, chlorine and magnesium.

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1) MINING ACCIDENTS & RISKS, TRADITIONALLY AFFECTING GOLD MINE WORKERS:

Cave-ins, rock-slides
Ceiling collapses
Chemical fires
Chemical-fume exposure
Clostraphobia and/or confined spaces
Consuming and proximity to untreated water, dangerous chemicle concentrations, mercuric concentrates...
Dewatering failures - deep ruptures of dewatering systems (*see flooded gold mines)
Dismemberment of various forms (caught in machinery)
Drowning - Accidental contact with unrestrained flooding; inability to swim, loss of consciouness
Dust and particulate exposure, constant dust-particle inhailation (even despite best efforts to abate it.)
Ear-injuries (hearing problems and tinnitus) from unregulated or monitored OSHA restrictions...
Earthquakes and associated mine failures (see unsafe mining problems underground)
Electrocution and/or Electrical malfunctions, Electric vehicles in tunnels (personal injuries)
Entrapment (of many different kinds)
Equipment malfunctions, failures and user-mistakes
Exploding vessels, pipes, hoses, hydraulics under pressure
Explosives and Breaking agents - misfired, mistimed, faulty detonation, uncontrolled
Eye injuries, Optical issues
Fall of roof, ceiling, sliding rock or material, face, rib, side or highwall
Falling from ladders and moving equipment
Falling, rolling, or sliding rock or material of any kind
Fault-fractures
Failures of underground restraint systems and miner-protection systems
Fatigue [40.22 percent, #4 adverse condition]
Flooded gold mines*: De-watering former gold mines is arduous, expensive, problematic and endless
Gas and toxic Fume Fires:
Hearing loss, noise indueed loss of hearing. [62 perecnt , #5 adverse condition]
Hand tool failures and misuses
High-Temperatures [42.11 percent, #3 adverse condition]
Hoisting
Hypoxemia is a below-normal level of oxygen in your blood, specifically in the arteries.
Ignition of explosives, gas or duct
Insomnia, difficult sleeping and disrupted dreaming-cycles
Inundation - Unforseen blockages of escape routes
Lack of clean air at depth (especially below sea level) Nevada county is at
Lack of efficient sunlight and/or lighting, DIM LIGHTING [45.86 percent, #2 adverse condition]
Lack of effective before-hand safety training
Material handling
Mining gasses - unexpected intrusions...
Moisture, constant envorinmental [62.percent, #1 adverse condition]
Mold and Mildew from constantly wet environments underground, continual, daily dewatering for decades
Motorized vehicle accidents (in-mine or above ground)
Panic attacks
Powered haulage and Non-powered haulage
Rapid decent and ascent into and out of the mines (ear-drum barotrauma)
Seizures, fainting, passing-out, lloss of consciousness
Skin and body wounds; Stepping or kneeling on objects
Slipping
Smoke-inhaillation, toxic fumes inhaillation
Tinnitus [31.58 percent, #6 adverse condition]
Tunnel fires, wood fires
Unforeseen mining disasters not on this list!

2) MINING MALADIES, ILLNESS AND DEATH: (Long-term illness from extended exposures)

Adverse reactions to medications
Alcoholism and Tobacco consumption and other exacerbated health problems
Arrhythmia
Asthma
Audio impairments
Bacterial , viral and fungal diseases
Blood-pressure issues, heart conditions
Cave Gas: Gas poisoning from a variety of mining gases in varying concentrations
Chemical poisoning
Chills, hypothermia, high temperature, hypothermia
Cholera,
Chronic bronchitis
Communicable diseases
Cyanide poisoning
Deafness from blasting and loud equipment
Decreased life-expectancy
Delirium, fainting, loss of consciousness
Diminished immunal capacity
Diphtheria
Dysentery
Drug use by miners (creates risks for mine-owners)
INSECTS, CRITTERS: fleas, mice, spiders, bats, termites
Emphesema
ESRD - End-Stage renal disease
Ethnic Tensions
Gastrointestinal illnesses
Headaches
Immune system degradation and disease
Increases in various forms of cancer
Kidney diseases of various kinds, including cancer
Lack of ventilation in the mine shafts and tunnels
Liver Diseases
Lost, broken, crushed, infected and severed limbs
Lung cancer
Mercury, lead, cyanide, or arsenic poisoning
Mine-gas
Non-Hodgkin's lymphoma
Pleural diseases: (https://www.uofmhealth.org/conditions-treatments/pulmonary/pleural-diseases)
Pneumonia
Pneumoconiosis
Pre-leukemia
Pulmonary Tuburculosis (PTB)
Racial / Personal tensions
Silicosis: Silicosis, an incurable lung disease that can lead to disability and death
Sleeplessness
Stress-related illnesses
Toxics and hazardous materials exposure(s)
Thirst- lack of access to safe drinking water
Trachea, bronchial, lung and pulmonary conditions (colds, fever...)
Tuberculosis
Typhoid fever
Vertigo
Visual impairments

3) STOP-WORK ISSUES
Archaelogical discoveries
Earthquakes, earthen collapses and catastrophic cave-ins
Explosives discharges/accidents
Labor Strikes
Mass water intrusion, flooding, Inundation events
Sudden forced evacuation
Power failures
Sabotage of facilities on mine property
Major mine equipment failures
Unforeseen environmental accidents above and below ground

FOOTNOTES:
https://journals.lww.com/md-journal/fulltext/2020/02280/physical_symptoms_and_mental_health_status_in_deep.42.aspx

Biometric hazards within the context of deep level mining: https://www.saimm.co.za/Journal/v105n06p387.pdf

AND/OR,

What are causes worthy of the mine to close?

1) In a perfect world, mines would only close **when their mineral resources are exhausted**. In coal mines for example, the coal seam between the sandstone, shale or conglomerate sedimentary layers would have been completely extracted. Similarly, in hard rock mines, the valuable metals would be completely recovered.

2) An earthquake strong enough to shake the mine significantly for the tunnels and shafts to collapse, such as reducing all the empty spaces in the mine to fall in upon themselkves, and most likely creating massive sink-holes in the surfaces above.

3) For mines deep below the oceanic surface, sea-water intrusion could be catastrophic. For example, a mine that is 2,500 feet above sea-level, proposes to drill to 5,000 feet or more. That is half a mile below sea level. Should the weight of sea water against a fault, deliver significant-enough pressure to collaps it-s way into the main shaft, it would fill in all empty spaces below sea level. Serious intrusion of large water sources ic clearly not desireable.

SEE: The Office of Surface Mining Reclamation and Enforcement (OSMRE), for example, is a bureau within the United States Department of the Interior created to address coal mine remediation.
https://www.thermofisher.com/blog/mining/mining-and-the-environment-what-happens-when-a-mine-closes/

Mining Feature: Inundations Can Put Miners at Risk by Blocking Escape Routes

Keywords: Evacuation Inundations Multiple seam mining National Institute for Occupational Safety and Health Rescue
Saturday, June 30, 2012

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- Flash floods (as in the case of Monday's incident) where heavy rainfall or swollen creeks and rivers dump large amounts of water into a mine entrance. This rapid inflow of water can trap miners by blocking escape routes. Water settles into the low areas of a mine tunnel or drift.
- Mining into an adjacent, abandoned mine that is flooded is another way to cause an inundation. Safety experts say this is an infrequent, but a very preventable type of inundation. Older mines may be poorly mapped meaning the boundaries are not accurately known. Mining next to one of these sites can be dangerous if the new mine workings break into an older mine that is flooded. This can be avoided by drilling ahead with a small probe that could expose a possible flooded drift in an adjacent mine, so as to avoid exposing the flooded area to the newly mined area.
- Another way a mine can incur inundation is when coal slurry, or left over mining waste, is not properly contained in an impoundment (a banked in area that holds the mineral/water mixture left over from mining). If this impoundment fails, slurry can also enter and quickly flood a mine.
- Mines can also become inundated by mining under an aquifer, such as a lake, when the ground above the mine is damaged by the mining activity.

Typically, water rapidly enters a mine in one of these four scenarios, cutting off escape routes for miners. Coal mines are particularly vulnerable to inundation due to their relatively flat orientation. As water enters, it flows to the lowest point, blocking the escape route. Mine engineers are constantly reminded of the need to provide multiple, independent escape routes for miners to prevent them from being trapped in cases such as this. (End)

RELATED RESOURCES:
1) pubs.usgs.gov (November 2005)

2) "Heavy Metal Pollution from Gold Mines: Environmental Effects and Bacterial Strategies for Resistance" **(https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5129257/)**

3) You may also google " Index of minerals and elements dangerous to human health"

4) Minerals: Their functions and sources: https://www.uofmhealth.org/health-library/ta3912

5) https://www.cdc.gov/niosh/index.htm/ , (and, this other index of related gold mining health issues:) https://search.cdc.gov/search/index.html?query=gold%20mining&siteLimit=NIOSH&dpage=1

6) EARTHWORKS: The Pervasive Problems of Gold mining

A RANDOM QUESTION I POSTED ON MINEWATCH 2/25/22
STRIP-SEARCH THE MINE WORKERS

I saw one of the "investor brochures" today, for the planned mine. An interesting detail... the "planned change-room/office facility." In most large mining operations, at the end of their shift, workers are extracted from the mine and guided to a shower-room where they disrobe and leave all their clothes to be inspected in one room, then shower in another room, and then are (ostensibly) "inspected" for loose (swallowed, inserted...) gold. First, you walk naked through a "gold-detector, to see if any bells, lights, whistles go off. I am told, (by a lifelong miner), that IF the bell rings, there is on-site a "cavity inspector" whose job it is to assure no miners are 'carrying' contraband gold out of the mine. Seems crazy, BUT, at $1,900.00 per ounce (market price varies) the risks to the mine and miner are potentially severe..., and, in this example, half an ounce is $950., a quarter ounce is $475., an 1/8th of an ounce is about $240.00, which weighs 2.50 grams, or, the weight of an American DIME, but far smaller.

So, I then wondered, "how much gold would you have to steal to be charged with Grand Theft, lose your job, and potentially go to jail?" Google informed me: "Penal Code 487 PC defines grand theft as **unlawfully taking someone else's money, labor or property with a value of $950.00 or greater**. The offense is a "wobbler," *meaning it can be charged as either a misdemeanor or a felony.*" So, beyond using a metal-detector sensitive enough to register gold, (including your tooth-caps, earring, piercings and wedding ring, earrings, etcetera) then, I suppose they need an x-ray machine or fluoroscope machine to inspect the innards of their workers..., perhaps daily!!! Seems logical to me that, working in a mine and swallowing some gold in today's world, could get you a felony arrest and jail-time.

Now, was this true in the distant mining past, no, why, no x-ray machines were on-site, gold was worth $20-45. an OUNCE, and greed-driven thievery, was neither a critical (nor, necessarily enforceable) issue. So, any greedy job-seekers or employees at the mine, can/may possibly..., look forward to full body inspections upon leaving work. Similar to prison inmates who are screened for a knife ("shiv" (a knife or razor used as a weapon)), they want to take back to their cell. These inspections may be random, like drug testing, they may be based upon your job and actual access to the ore... Or, possibly, everyone in any contact with freshly mined gold will be daily-scanned. Historically, these folks were known as "highgraders."

Correct me if I am wrong, I often am! All insights on this are welcome! Thanks! Pat
(P.S., I wrote a book about sushi and Japanese cuisine and history a few years ago. In a fine Sushi restaurant, a chef-friend, gave me sushi with gold leaf on it. I ate it. No problem. It was microns thin. But, in Japan The Emperor ate it, because he could.)

DEFINITIONS of COMMON GOLD-MINING MINERALS, ELEMENTS, AND THEIR DANGERS TO HUMAN HEALTH

(Research compiled by T.P. Jacobsen 2/20/22 onward. UPDATE: 4/4/22 2:46:57 PM)

***PREAMBLE:** The purpose of this list/effort, is to research and confirm, to the best of my ability, the ACTUAL historical materials to be found in the largest mines of their kind, known to have operated in the past 175 years in the Nevada County, CA, Grass Valley mining region. The major mines which this research is reflecting are the: Empire Mine, The North Star Mine, The Idaho-Maryland Mine and the Pennsylvania Mine. Many other far smaller mines skirted nearby these leaders, and only the Central Consolidated and the Empress Mine approached the other leaders in size and output. Today, in 2022, with gold worth $2,000 USD per ounce, the highest value inrecorded history, the ATTEMPTED "re-opening" the Idaho-Maryland mine seems a folly, since these major regional mines which have been closed for over 70 years. Public sentiment is BY FAR, against it! (March 2022).*

Therefore, I have created this document, and an entire binder of hundreds of research pages around this idea, to illuminate "fence-sitters," as well as all concerned land-owning citizens, as to the nature of both sides of the proposition. Most, but (perhaps) not all elemental constituants herein, are in each and every mine, or neighborhood. Neither, may they be in detremental-quantities, that might harm the public, nor, mine workers.

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***PERSONAL EDITORIAl:** I simply feel that..., I am compeled to pursue this because..., my/our home is within 1/2 mile of the center of the "NEW," potential (albeit improbable) rebuilding of the I-M Mine, as they plan to get "ALL they can," from whatever reaches the may explore, that our neighborhoods, underground water sources, etc, and quality of life shall be irrevocably destroyed by an "out of country' mining company, who smells profits, then moves on. I simply cannot stand by and allow this, without at least an intellectual fight. But, logic does not always prevail, nor, do facts! As a lifetime California and West Coast historian, author, publishor and researcher, who now lives in this region since 1994, I shall offer to do my best to defeat their folly and technologically-unproven attempt, to empty the wealth of our lands (no matter their promises...), in the name of profit-companies from other lands (British Columbia), at the wreck-and-ruin of short-sighted-foreign militantly-minded, and clearly in their tactics, greedy for what is not theirs, by simply buying into a legacy without care nor consideration for the "natives' and modern society, who live here. Not all battles are fought with weapons. This invasion, shall be fought with all the best we as a regional society can bring, to protect our ways of life... Nearly 80 years after all the "Big Mines" closed and fell into history! -- Thomas P. Jacobsen, California Historian, Nevada City resident.*

***CAVEAT:** I cannot prove nor disprove what I have mentioned here. I am not a scientist of mining history, nor regional geophysical phenomenon. But, I AM a serious researcher and historian and author (40+ years), so, there is a deep, good-faith application of well-researched and quantifiable information here, which can be trusted. I draw upon only the most verifiable sources (often footnoted!), and I stand behind myt assertions and 48 years of work! - Patio*

DEFINITIONS:

What is the scientific definition of a mineral?
A mineral is a naturally occurring inorganic solid, with a definite chemical composition, and an ordered atomic arrangement. This may seem a bit of a mouthful, but if you break it down it becomes simpler. Minerals are naturally occurring. They are not made by humans. Minerals are inorganic.

What is the scientific definition of an element?
A substance that cannot be broken down into simpler substances by chemical means. An element is composed of atoms that have the same atomic number, that is, each atom has the same number of protons in its nucleus as all other atoms of that element. A chemical element, also called element, any substance that cannot be decomposed into simpler substances by ordinary chemical processes. Elements are the fundamental materials of which all matter is composed.

* FOLLOWED BY A 21 PAGE LIST OF OVER 110 DIFFERENT ELEMENTS, MINERALS AND TOXICS IN LOCAL MINES (I'll PRINT ONE AT YOUR REQUEST)

Arsenic hazards to humans, plants, and animals from gold mining

Ronald Eisler[1]

Abstract: Arsenic dangers to humans and animals

Arsenic sources to the biosphere associated with gold mining include waste soil and rocks, residual water from ore concentrations, roasting of some types of gold-containing ores to remove sulfur and sulfur oxides, and bacterially enhanced leaching. Arsenic concentrations near gold mining operations are elevated in abiotic materials and biota: maximum total arsenic concentrations measured were 560 microg/L in surface waters, 5.16 mg/L in sediment pore waters, 5.6 mg/kg DW in bird liver, 27 mg/kg DW in terrestrial grasses, 50 mg/kg DW in soils, 79 mg/kg DW in aquatic plants, 103 mg/kg DW in bird diets, 225 mg/kg DW in soft parts of bivalve mollusks, 324 mg/L in mine drainage waters, 625 mg/kg DW in aquatic insects, 7,700 mg/kg DW in sediments, and 21,000 mg/ kg DW in tailings. Single oral doses of arsenicals that were fatal to 50% of tested species ranged from 17 to 48 mg/kg BW in birds and from 2.5 to 33 mg/kg BW in mammals. Susceptible species of mammals were adversely affected at chronic doses of 1-10 mg As/kg BW or 50 mg As/kg diet. Sensitive aquatic species were damaged at water concentrations of 19-48 microg As/L, 120 mg As/kg diet, or tissue residues (in the case of freshwater fish) > 1.3 mg/kg fresh weight. Adverse effects to crops and vegetation were recorded at 3-28 mg of water-soluble As/L (equivalent to about 25-85 mg total As/kg soil) and at atmospheric concentrations > 3.9 microg As/m3. Gold miners had a number of arsenic-associated health problems, including excess mortality from cancer of the lung, stomach, and respiratory tract. Miners and schoolchildren in the vicinity of gold mining activities had elevated urine arsenic of 25.7 microg/L (range, 2.2-106.0 microg/L). Of the total population at this location, 20% showed elevated urine arsenic concentrations associated with future adverse health effects; arsenic-contaminated drinking water is the probable causative factor of elevated arsenic in their urine. Proposed arsenic criteria to protect human health and natural resources are listed and discussed. Many of these proposed criteria do not adequately protect sensitive species. (https://pubmed.ncbi.nlm.nih.gov/14561078/)

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6) EARTHWORKS: The Pervasive Problems of Gold mining

LEGAL OVERSIGHT OF THE U.S. MINING INDUSTRIES

California Department of Conservation Mine Reclamation
STATUTES & REGULATIONS JANUARY 2020 - Gavin Newsom, Governor
https://www.conservation.ca.gov/index/Documents/DMR-SR-1%20Web%20Copy.pdf

WHO REGULATES MINING IN CALIFORNIA?
State Mining and Geology Board. "SMARA" also encourages the production, conservation, and protection of the state's mineral resources. Public Resources Code Section 2207 provides annual reporting requirements for all mines in the state, under which the State Mining and Geology Board is also granted authority and obligations.

WHO REGULATES GOLD MINING IN AMERICA?
The **U.S. Department of Interior** *,Bureau of Land Management and the U.S. Department of Agriculture Forest Service Exit Exit EPA websiteregulate mining activities on federal land managed by these agencies. The U.S. Army Corps of Engineers, EPA, and state agencies also have roles in regulating the mining industry.
*https://search.usa.gov/search?query=gold+mine+regulations&op=Search&affiliate=doi.gov

WHAT ARE NEVADA GOLD MINE'S ENVIRONMENTAL POLICY COMMITMENTS?
Minimize our use of water and control our impacts on water quality. Engage with stakeholders including local communities to support sustainable management of water resources for the benefit of all local users. Use energy as efficiently as possible.

Who regulates mining companies?
Department of Environment and Natural Resources
Which Government bodies administer the mining industry? The DENR regulates and administers the mining industry. The Department of Environment and Natural Resources is the executive department of the Philippine government responsible for governing and supervising the exploration, development, utilization, and conservation of the country's natural resources. The Mining Act governs large-scale exploration, development and utilisation of mineral resources.
1.2. Sep 13, 2021

WHICH STATE HAS THE MOST GOLD?
(In Order: 1. NEVADA, 2. ALASKA, 3. COLORADO, 4. CALIFORNIA, 5. ARIZONA) ...
" 4. California - "Californian gold was first discovered along the Colorado River, in the Potholes district (present-day Imperial County) by Spanish prospectors between 1775 and 1780. In 1848, James Marshall found gold at Sutter's Mill, Coloma, which started the California Gold Rush." Exhaustion of placer deposits gave rise to hard rock mining (quartz mining) in 1849, and three years later hydraulic mining of placer gold started. California's gold production peaked in 1852, with 3.9 million troy ounces (121 tonnes) being produced that year. With rich placer deposits being discovered in the Columbia Basin in Sonora district's Jamestown in 1853, total gold production surged to 5.9 million troy ounces (183 tonnes). Despite these new methods, production began declining and by 1865 it had plunged to 867,000 troy ounces. From 1939 to 1941, there was a sudden surge as gold production went up to 1,400,000 troy ounces for each of those three years — one of the reasons being a price rise from $20.67 to $35 per ounce. World

War II and the shutting down of gold mines to free up men to fight saw production plummet and never subsequently recover to pre-conflict levels. California's gold production in 2018 was 140,000 troy ounces — all coming from the Imperial County Mesquite mine. Owned by Equinox Gold, active mining was resumed in 2007, after being inactive since 2001." (https://www.nsenergybusiness.com/news/top-five-gold-mining-states-us/)

How many abandoned mines are in California? The BLM and the California Department of Conservation's Office of Reclamation estimate there are **approximately 47,000** abandoned mines in California, two-thirds of them on Federal lands. Nov. 23, 2009

Are there any active mines in California? California's **700 active mines**, which employ about 5,300 people, produced minerals valued at $3.4 billion in 2009, down from the 2008 total of $4 billion. California's production accounted for 6.3 percent of the nation's total. About two dozen industrial minerals made up most of the total production value.

Idaho-Maryland Mine Technical Data

https://mrdata.usgs.gov/mrds/show-mrds.php?dep_id=10310630

REGIONAL GEOLOGY The Idaho-Maryland Mine is the second largest underground gold mine in the Grass Valley District. The Idaho-Maryland and the Empire-North Star Mine, located to the south, are the two largest-producing underground gold mines in California. The district is located in the northern portion of the Sierra Nevada Foothills Gold Belt. This belt averages 50 miles wide and extends for about 150 miles in a north-northwest orientation along the western slope of the Sierra Nevada range. The Foothills Gold Belt roughly coincides with the Foothills Metamorphic Belt, which can be subdivided into four major lithotectonic belts: Western Belt, Central Metamorphic Belt, Feather River Peridotite Belt, and Eastern Belt. The Grass Valley District lies within the Central Belt, where in the Grass Valley area it is marked by an 8-mile-wide north-trending assemblage of two accreted terranes that range from Late Triassic to Late Jurassic in age. The Central Belt is bounded on the east and west by regional-scale tectonic suture zones; the Wolf Creek Fault Zone on the west and the Gills Hill Fault/Melones Fault Zone on the east. The oldest rocks in the area are those of the Carboniferous-Triassic metasedimentary Calaveras Complex. Originally clastics, these rocks were converted to schistose or slaty rocks during the Late Paleozoic orogeny and locally into a contact-metamorphic biotite gneiss by intruded granodiorite during Late Mesozoic time. The slates of the Jurassic Mariposa Formation, which outcrop in a small part of the area, are relatively unaltered. Igneous rocks in the district include granodiorite, diabase, porphyrite, amphibolite schist, serpentinite, gabbro, diorite, quartz porphyry, and various dike rocks (Johnston, 1940). The veins of the Grass Valley and neighboring Nevada City districts are not connected with or continuations of the famous Mother Lode vein system to the south. The last veins of the Mother Lode end about 20 miles to the south. Also, the Grass Valley veins differ in general character from those of the Mother Lode. Generally, the Grass Valley veins are narrower and produce a higher-grade ore than those of the Mother Lode. The veins trend in two primary directions. One set trends N-S (dipping E or W), and the other trends E-W (dipping N or S). The major feature of the Grass Valley District is a body of Lower Cretaceous granodiorite and diabase five miles long from north to south and half a mile to two miles wide (probably the apex of a larger batholitic mass). It which is intruded into older sedimentary and igneous rocks, including diabase of the Mesozoic-Paleozoic Lake Combie Complex, and is itself cut by various dike rocks. Gold-quartz veins cut the granodiorite and diabase (and in some cases, serpentinite) throughout the district. Most of the veins strike generally north, parallel to the intrusive body, and display gentle dips averaging 35?. Others strike northwest, parallel to a diabase contact with the granodiorite. The veins fill minor thrust faults that occur within fracture zones of various width and degree of fracturing. The maximum measured reverse displacement is 20 feet (Johnston, 1940). In all veins, quartz is the principal vein material and occurs in four textural types: 1) Comb quartz that forms crustifications and lines vugs, 2) massive milky quartz with a granular texture that displays many sharp crystal faces and has not undergone deformation, 3) sheared quartz developed with little or no dilation of the vein fracture and commonly showing ribbon or shear-banding structures, and 4) brecciated quartz formed where vein movement dilated the interwall space (Johnston, 1940). Gold occurs in quartz and in sulfides, principally pyrite. Although specimen ore has been found, most ore from the district occurs as fine and coarse free-milling gold in ores averaging between 0.25 to 0.5 ounces per ton.

- An important structural feature in the district is a group of "crossing" vertical or steeply dipping fractures that strike northeast, about normal to the long axis of the granodiorite body. In places they are simple fractures; elsewhere they form sheeted fracture zones several feet wide. Some are tight, some are open and form watercourses, and few contain any quartz. Two main stages of primary or hypogene mineralization are recognized - 1) a hypothermal stage represented by one vein and one mineralized crossing, in which magnetite, pyrrhotite, pyrite, and specularite were deposited, and 2) a mesothermal stage, in which the gold quartz veins were formed. The mesothermal stage is further divided into two sub-stages - an older one, in which quartz is the principal gangue mineral, and a younger one, marked by the deposition of carbonates. Pyrite and arsenopyrite, deposited in the quartz stage, are the earliest sulfides of the gold-quartz veins. Sphalerite, chalcopyrite, and galena are somewhat later. No secondary or supergene minerals have been noted except limonite, calcite, and gypsum, which are being deposited in the oxidized zone. The distribution of gold in the ore shoots is extremely erratic and assays of adjacent vein samples commonly differ widely. Some ore shoots have a pitch length of several thousand feet, but most are much smaller. Adjacent to veins and crossing fractures, the wall rocks are generally highly altered. Ankerite, sericite, and pyrite have replaced the original rock-forming minerals. Lesser amounts of chlorite and epidote have been found. The wall rock has not been replaced by quartz. LOCAL GEOLOGY By far the most important vein in the Idaho-Maryland Mine was the Eureka-Idaho-Maryland vein. This vein strikes N 77? W and has an average dip of 70? SW, ranging between 50? and 80?. The hanging wall is composed of diabase and gabbro, and the footwall is serpentinite. All of the rocks are highly altered and contain abundant ankerite. Mariposite commonly occurs in the serpentinite. The famous Eureka-Idaho ore shoot had a pitch length of almost 1 mile and a breadth of 500 to 1,000 feet. The width of the shoot averaged 2.5 feet but reached 8 feet in places. The average gold content in the Eureka-Idaho shoot was 1 ounce/ton. Most of the gold was free gold, and much specimen ore came from this famous shoot. Between 1-2 percent of the ore was sulfides, pyrite being the most abundant. Lesser amounts of galena, chalcopyrite, and sphalerite are present. The sulfides yielded between 5 and 20 ounces of gold per ton.

- The Idaho-Maryland is the second largest underground gold mine in California behind the Empire Mine. The mine was located in 1865. The first period of mining extended from 1867, when the Idaho Quartz Mining Company was organized, until 1893. In 1867, a shaft was sunk to 300 feet and encountered a rich pay shoot (the eastern extension of the Eureka - Idaho Ore Shoot). The Idaho Quartz Mining Company worked this same pay shoot stoping it for a distance of 3500 feet along strike until 1893 when the eastern limit of the Idaho claims were reached. Total output up to this time was $11,638,000, with ore ranging $12.76 to $35.00/ton and averaging $20.00/ton. Most of the gold came from the Eureka-Idaho shoot, which averaged 2.5 feet wide yielded 1 ounce/ton. The Idaho Mine was developed by a shaft inclined at 70 degrees to the 1000-foot level and an inclined winze raking to the east, called the Canyon shaft, that bottomed at the 1600-foot level at a vertical depth of 2,180 feet. In 1893, in settlement of a dispute over the eastward extension of the Eureka-Idaho shoot, the Maryland Company acquired the Idaho Quartz Mining Company for $85,000. From 1893 until 1901, the Maryland Company operated the mine and produced $1,250,000 in gold. A winze was sunk from the 1,600- to the 1,900-foot level. However, in 1894, a fire destroyed the hoist and the mine was flooded and workings below the 1,600-foot level were not reclaimed. In 1901, partly because of the poor condition of the workings, the mine was closed. The mine remained idle until 1903 when it was bonded to the Idaho-Maryland Development Company, which worked it until 1914. The company succeeded only in reopening it to the 1600-foot level, and the $300,000 in gold they produced came mainly from old stopes and pillars left behind by the earlier operators. A fourth period of activity

extended from 1918 to 1925, when the mine was operated by the Metals Exploration Company. At a cost far exceeding the $500,000 in gold it produced, the main shaft was extended downward 1,000 feet to the 2,100-foot level at a vertical depth of 2,000 feet. Drifts on the 2,000- and 2,100-foot levels were driven from the main shaft, the Dorsey winze, and a new winze was sunk 850 feet below the 2,000-foot level. Failing to find a new ore shoot, the company suspended operations in 1925. Control of the property changed hands in 1926 when Errol MacBoyle and Edwin Oliver created holdings that included the Idaho-Maryland, Brunswick, and Morehouse mines. Work resumed the same year under the Idaho- Maryland Mines Company. New ore was found and the mine entered a period of prosperity. During the three years 1930, 1931, and 1933, the mine produced $1,681,887. Total production for the period 1868 - 1933 was almost $16,000,000. From 1926 to 1942, the mine produced 650,000 ounces of gold from 1.1 million tons of ore. The mines were closed in 1942 due to enactment of the Federal War Production Board's Limitation Order L-208, but were reopened again in 1945. Production was hampered by depleted operating funds, rising costs, labor shortages, and negligible exploration. All mining ceased in 1957. At the time of closure, the mine was owned by Idaho-Maryland Industries. In 1983, Emgold Mining Corp., through its subsidiary Emperor Gold (U.S.) Corp., obtained a lease and option to purchase all mineral rights formerly held by Idaho-Maryland Industries. From 1993 to 2000, Emgold spent $7,000,000 evaluating the Idaho-Maryland properties. The project was put on hold for 1.5 years while the lease and option were renegotiated. The revised Agreement includes a mining lease and option to purchase the property consisting of 2,750 acres of minerals and minerals rights and approximately 37 acres around the old New Brunswick shaft. The term of the lease is 5 years commencing on June 1, 2002. As of March, 2004, Emgold had conducted a boring and assessment program, but has not yet commenced mining operations.

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Additional information on the Idaho - Maryland Mine is contained in File No. 331-9392 (CGS Mineral Resources Files, Sacramento)

The Security Gate at the Industrial Lot for Idaho-Maryland
(March 9, 2022)

After hearing the report some months ago by the "Botanist" who certified their own Wildlife Report..., I remembered that every time I had driven into the mine property, whether to do green wast last year, talk with, and drop-off wood for the "Forewood for Seniors" program, the gate was locked but the fence was deliberately cut open, and never repaired, nor, re-tied to the main anchor-post. Today, when I drove by again (March 9, 2022), I saw the gate was still locked, but the fence had a three-foot gap where the cyclone fencing had been pulled away. The wood-chips and bark of a couople years was collected all along the bottom of the fence, except where.... I had been left open for deer, bears w/ cubs, which I documented last year when PG&E had a lease on the mine property for replacing poles and wire from the fires of 2021! I have also PERSONALLY seen bears, deer, raccoon families, foxes, coyotes and one big German Shepherd go through in the evenings. A PG&E Security Agent, who worked there throughout the lease last year (2021) said she would "happily shere her knowledge of the critters and wildlife that passes through here, including one mother bear and her three cubs."

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August 6, 2021 - From my post on the Minewatch site: "I stopped by the Brunswick site again today, the security guy sent me to the head-honcho of the long-term PG&E team and supply people , who are leasing the acreage and unloading new log phone-poles, wire, etc, to replace what has been burned in the recent fires, for infrastructural replacement. "NOTHING HERE HAS ANYTHING TO DO WITH THE MINE!" I chatted with her about the mine proposal and it's impact, and the 24/7/365, eighty year lease, etc. She just shook her head in disbelief and asked "why, now, this is a populated area now, not like it was long ago."I mentioned dewatering down Wolf Creek, and she said ..." Yesterday, some of us were right here by the gate and a BIG mama bear came running through here with THREE CUBS, heading over toward that creek, lots of berries over there. We stayed out of their way. Oh, there's wildlife here!" Patio . (She also asked that folks not come there, because you cannot trespass on the PG&E lease. I told her I would not publish her name.) But, since I now know her, I can stop in now and then with questions!"

WHAT ARE LAURA, MYSELF AND OUR LOCAL NEIGHBORS, MOST CONCERNED ABOUT

785-5 THE MINE REOPENING, AND ITS AFFECTS UPON THE WATER SOURCES RELATED TO LOCAL HOMEOWNERS WITHIN 5 MILES OF THE POTENTIAL RE-OPENING OF THE I-M MINE (2022) (FEB.28, 2022.)

1) LOSING OUR WATER SUPPLY, THUS OUR INNATE PROPERTY RIGHTAS AS HOMEOWNERS IN THE REGION.

785-6 2) THE RE-INDUSTRIALIZATION OF GRASS VALLEY LESS THAN HALF-A-MILE FROM OUR HOME ON GREENHORN ROAD, and the devaluation of our homes, properties and lifestyle.

785-7 3) TRAFFIC IMPACTS, WHEN MINE-TRUCKING CHOKES OUR LARGEST AND ONLY ARTERIES TO AND FROM DOWNTOWN GRASS VALLEYAND CEDAR RIDGE.

785-8 4) THE REMOVAL OF OUR REGIONAL GOLD RESOURCES, BY A COMPANY FROM BRITISH COLUMBIA, WHO WILL NOT SHARE IN THE FINANCIAL GAINS IN ANY RELEVANT WAY WITH LOCAL RESIDENTS.

785-9 5) THE RESUMPTION OF POURING TOXIC CHEMICLES, DIRT, AND DEBRIS INTO OUR LOCAL RIVERS, THAT HAVE TAKEN NEARLY ONE-HUNDRED YEARS TO RESTORE!

785-10 6) DEVASTATING IMPACTS TO OUR VERY WAY OF LIFE HERE AND OUR RETIREMENT QUALITY OF LIFE IN OUR HOME AND NEIGHBORHOOD!

MOSSMAN & RISE

https://iknnews.com/rise-gold-rise-v-ben-mossman-up-to-his-tricks-again/

About The Author

A resident of Peru for two decades, Mark Turner is the author of the IKN blog and The IKN Weekly, providing unique insight and truly independent analysis on the junior mining sector since 2008. He is proud to be hated by many mining sector executives and will politely decline the kind offer to appear on your webinar, TV slot or media interview.

Disclaimer

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12 / 23 / 15

News from Banks Island Gold (BOZ.v), Louis James's "biggest personal position" In three snack-sized parts.

1) Here's what Louis Lobito Little Wolf James, fake geologist and chief rock kicker at Casey Research, said about Banks Island Gold (BOZ.v) in 2014 when he pumped the merry bejeez out of it and got people in at 50c (and here's an extract line or two):

"I want to remind readers that both Doug Casey and I own shares in Banks. Personally, it remains my largest position."

"...I'm reiterating my renewed Buy recommendation. Whatever happens in the near term, these shares are a great buy, whether for a first tranche or a second. I intend to buy more myself—after giving you a chance to do so first."

2) Here's what IKN said about Banks Island Gold (BOZ.v) when your humble scribe eventually took a look at the thing (and here's an extract line):
"Seriously. I mean, seriously, how can anyone in their right mind like a company with a balance sheet like this? Let alone somebody as dangerous to other people as Lobito who recommends it to other people. Especially when those people are a bunch of naive sheeplike followers who require a little expertise in the sector, not tripledumb investment advice?"
"I knew Louis James was stupid about geology. I didn't realize how stupid he was about financials. The above is just plain embarrassing, it's amateur hour level."

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3) And here's what **BOZ.v said today:** *VANCOUVER, BRITISH COLUMBIA–(Marketwired – Dec 23, 2015) – Banks Island Gold Ltd. (TSX VENTURE:BOZ) (the "Company") announces that the Company has canceled the equity financing announced by news release on December 1, 2015. The Company did not receive sufficient interest to be able to close the $3M minimum financing required to support its operations over the coming months.*

As a result, the Company has insufficient funds to maintain operations and has received notice of claims from three significant trade creditors for payment of outstanding debt. The mining reclamation bond posted by the Company with the Ministry of Energy and Mines has been confiscated by the Ministry. The Company has provided notice of termination to all of its remaining employees effective December 31, 2015. The Board of the company is currently comprised of Ben Mossman, Jason Nickel, John Anderson and Frederick Sveinson.

The Company is consulting with its legal advisors, and will provide a further update on the Company's status in the coming weeks. How's that trade doin', Lobito?

08 / 08 / 20

How scams operate, Rise Gold (RISE.cse) edition
They are desperate to force this through after failing to pass the resolution at the July 2020 AGM, the whole plan from the beginning was to exchange your dollar bills for Benjamin Mossman's paper. Therefore, they are going to SGM next month and woe betide any of you holding the paper at that point, because they won't make a silly admin error again.

Be clear, this company is worthless because its only project isn't just unpermittable, it makes Pebble look like a walk in the park. Lawrence Lepard should be thoroughly ashamed of himself for getting mixed up with this white collar criminal Mossman.

Rise Gold Announces Special Meeting

Grass Valley, California–(Newsfile Corp. – August 7, 2020) – Rise Gold Corp. (CSE: RISE) (OTCQX: RYES) (the "**Corporation**") announces that a special meeting (the "**Meeting**") of holders of shares of common stock of the Corporation ("**Shareholders**") will be held at 10:00 a.m. PST on September 18, 2020 at the Corporation's Vancouver office.

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At the Meeting, Shareholders will be asked to pass an ordinary resolution to approve an increase of the Corporation's authorized capital, from 40,000,000 shares of common stock with a par value of US$0.001 per share to 400,000,000 shares of common stock with a par value of US$0.001 per share, the same authorized capital as existed prior to the recently conducted reverse share split. The increase in authorized capital is necessary in order for the Corporation to, among other things, continue to raise capital in order to execute its business plan and finance its activities.

Under the Nevada Revised Statutes, pursuant to which the Corporation was incorporated, the vote will require approval of "a majority of the voting power," being over 50% of the Corporation's issued and outstanding shares.

The Corporation plans to mail proxy materials to Shareholders on August 28, 2020, which will contain additional details on the Meeting, including how Shareholders can submit their vote.

About Rise Gold Corp.

Rise Gold is an exploration-stage mining company incorporated in Nevada, USA. The Corporation's principal asset is the historic past-producing Idaho-Maryland Gold Mine located in Nevada County, California, USA. The Idaho-Maryland Gold Mine produced 2,414,000 oz of gold at an average mill head grade of 17 gpt gold from 1866-1955. Historic production at the Idaho-Maryland Mine is disclosed in the Technical Report on the Idaho-Maryland Project dated June 1st, 2017 and available on www.sedar.com.

On behalf of the Board of Directors:
Benjamin Mossman
President, CEO and Director
Rise Gold Corp.

THERE IS MORE ON THIS SITE

"DERAILING THE SHINY PROMISE"

Grass Valley's 174 year old mining legacy faces deeply fractured questions!

By T.P. Jacobsen (3/19/22)

The existance of gold in California has been historically known from the time of the expedition of Sir Francis Drake, 1577-79, being particularly noticed by Hakuyt in his account of the region, 271 years before the Coloma discovery. The next occurance of gold upon the placers was noticed in a work upon "Upper California" published in Spain in 1690 by Lyola Cavello, a priest at the mission in San jose, Bay of San Francisco, 158 years before Coloma. Later still, in 1721, Captain Shelvrocke speaks favorably of the appearnce of the soil-form gold, and of the "probably richness of the country in metals." The "Historico-Geographical Dictionary" of Antonio de Alcedo, 1786-89, positively affirms the abundance of gold even in lumps of 5-8 pounds. The favorable appearance of the country for gold, and of Oregon also, was noticed by Professor J.D. Dana, and recorded in his geographical report of the country. In Hunt's "Merchants' Magazine" for 1847, is a "very decided statement by Mr. Sloat respecting the richness of the country in gold, made from his obversations there the previous two-years; and he confidently predicts that its mineral development will greatly exceed in richness and variety the most sanguine expectations." *Why is this important?* Because, even young historians like myself heard "gold was discovered in 1848," while records state it was nearly 300 years earlier!

In these years of the late 1840s, the Mormons connected with the army were known to have gathered some gold upon the banks of the streams, and the Mexicans and Indians also. Thus, a party of three Americans, two of them Mormons, were on February 9, 1848, at Sutter's mill on the American Fork of the Sacramento, near the town of Coloma in El Dorado county, engaged in repairing the race, which had been damaged by the spring freshets, when the little daughter of the overseer, named James W. Marshall, picked up in the race a lump of gold and showed it to her father as "a pretty stone." The discovery didn't immediately attract much attention; and "the Mormons particularly sought to prevent the facts from being made public." The Rev. C.S. Lyman in a letter to the "American Journal of Science," of March 1848 says: "Gold has been found recently on the Sacramento [river] near Sutter's Fort. It occures in small masses in the sands of a new mill race and is said to promise well." The news spread rapidly and caused an unparalleled tide of emigration to pour-in from Mexico, South America, the Atlantic states, and even from Europe and China. Almost immediately, gold was discovered at a nearby "*Grassy Valley*," that today is Grass Valley, Nevada County, California's most famed gold mining region.

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Subsequently, gold miners flooded the area, and mining exploded! The Empire mine opened in 1850, and the Idaho-Maryland mine opened in 1867, ostensibly becoming the two richest and most productive mines in America during their heyday. Thirty-five years later, between 1902 and 1919, the Idaho-Maryland mine became inactive, but, was revived around 1920 and some mining resumed until 1925 when exploration again ceased. The North Star mine (opened in 1851) and Empire mine were consolidated in 1929. Then, in 1956, the Empire mine's operations ceased, as did the Idaho-Maryland. At that time, gold was worth an average of

$35.20 per ounce, up only slightly from the previous century. The three largest, most successful mines in the state, suddenly closed at the same time, 1956, with no timely consideration of reopening. All were closed and sealed, mine buildings were eventually demolished and the grounds laid silent. But, 66 years later in 2022, when gold reached its highest price in history, a tiny Canadian company, decided to attempt to reopen the most famous gold mining area in America, as visions of golden millions danced in their heads. Their headlong goal to create a "second gold rush," as it has been coined, has raised fears, suspiscions and intense regional concerns. Let's see why.

In 1843, before gold was "discovered" in California, it was nationally valued at $20.67 per ounce. Eighty years later in 1922, it was still worth $20.67 per ounce. In 1934 when the Depression was deepening, gold was just rising to $34.00. President Roosevelt then devalued the dollar by increasing the price of gold to $35 per ounce. Ten years later in 1943, crawling like a hundred-year-old-snail, gold finally found it's way to $36.50, as the world fought WWII. At that moment, gold had hovered between $26.00 and $36.50 (mostly lower) for more than a century. But, eventually, after (another) 66 years, in 2009, one-ounce of pure gold, reached over $1,000. for the first time. Moreover, today, in 2022, nearly 77 years after WWII, gold has suddenly reached more than $2,000. per ounce, or, one-hundred times what it was in 1922, 100 years ago. [(1)(2)]

That's why today we all must adjust to wisely navigating a careful and systematic plan for gold mining's possible future. The historical timelines are recorded and etched, the deeds are done, the history of Northern California's gold rush is today detailed in countless and and endless forms. An industry frought with massive populations shifts, industrial upheaval, ecological destruction on an unfathomable scale, 150 years of unknown dangers and misunderstood toxic legacies still lurk, waiting silently for the next unwary populous to re-open Pandora's 'golden' Box. There really is no way of sugar-coating the historically proven facts. No way either, to hide the irrefutable truths of gold mining's industrial and human histories, uneducated mistakes, myriad tragedies, and then later decades of near record dormancy. Each answer that is found, opens countless more questions. It begs the question, "If the past 174 years are over, and barely the bones remain, WHY would anyone start it all over again?" The answer seems simple, greed.

***"Modern industrial gold mining destroys landscapes** and creates huge amounts of toxic waste. Due to the use of dirty practices such as open-pit mining and cyanide heap leaching, mining companies generate about 20 tons of toxic waste for every 0.333-ounce gold ring." -- https://www.brilliantearth.com/gold-mining-environment/*

(3) *What else sells for that price PER OUNCE today in March 19, 2022? Prices vary in rare- metal markets, so these are the posted prices for today on the Internet. Rhodium $18,317.00, Iridium $4,900.00, Palladium is $2,555.00, Gold is $2,000.00, Platinum is $1,087.00, Ruthenium $620.00, Osmium $400.00, Silver, $25.00 and Copper is $.30 cents!*

THE HISTORY OF THE IDAHO MARYLAND AND ASSOCIATED MINES

By PAT JACOBSEN, California Historian & Author

(Update: 4/4/22 12:30:34 PM)

4/4/22 @ 12:07PM actual time I saved the final draft.

Premise: As the following report will show, mines have a life span that determines their place in history. Few become 'legendary,' few create remarkable wealth, and, as the treasuers therein diminish over time, they are not replaced. Left uncared-for, the go back to the environment from which they came. The Idaho-Maryland originally opened in several smaller forms, and evolved over time. Portions of the eventual mine included several other ventures that opened and closed, changed and failed, and were intensly mined of their precious holdings. The story is not difficult to unravel and explain, and each has it's own lifespan and soliloquy. In the end, the constituant mines of long regional past, had myriad problems, disasters, mergers, tunnel collapses, deadly underground problems, fires, labor strikes, governmental intrusions, the whole gambit. We must remember that resources are and access to them, especially gold, come with great costs and attendant dangers. This timeline details in brief, the tribulations of the respective mines who, over time, made-up the Idaho-Maryland endeavour. Like an old horse, put out to pasture, the mine has outlived its safety, viability and the presently-suggested plans, will never pass muster with Official State and other governmental agencies, safety inspectors and the public at large. The misguided and current proposal (and many former ones,) to reopen the I-M Mine, are riddled with false-hopes, dubious "facts," unrealistic goals and intentions, and an unprovable narrative by it's proponants, that a new life could be raised from the grave, like some magical Phoenix. Comprehensive research and historical research, "data-mining," clearly show the folly (and possible/probable hoax...) the current wannabe-millionaire "mine owners" are proposing, especially in the windstorm of current regional disapproval. Perhaps the lesson here, is to let the sleeping dog lay. -- Pat Jacobsen

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Bibliography: This entire document is based upon the edited version of the book here mentioned, for the edification of the history of the mine to those on the NC Board of Supervisors, who might find it useful, while making their determinations about the possible reopening of the Idaho Maryland mine in the future.

Let us work to agree that the future shall NOT repeat itself. - Pat Jacobsen (4.4.22)

"Gold in Quartz, The Legandary Idaho-Maryland Mine," Jack Clark, (c) 2005, ISBN: 0-933994-31-1

INTRODUCTION:

"The California Gold Rush (**1848–1855**) was a gold rush that began on January 24, 1848, when gold was found by James W. Marshall at Sutter's Mill in Coloma, California. The news of gold brought approximately 300,000 people to California from the rest of the United States and abroad."
https://en.wikipedia.org/wiki/California_Gold_Rush#:~:text=The%20California%20Gold%20Rush%20(1848,the%20United%20States%20and%20abroad

The Idaho-Maryland mine operated for over a 106-year period. Where Grass Valley is concerned, beginning in 1849-1850 placer gold found in Wolf Creek, Deer Creek and the Bear and Yuba Rivers, quickly exhausted in the shallow waters, and miner's set their sights on gold-bearing, hard-rock quartz veins and ground mining, known as "load-mining," which grew more rapicly in Grass Valley's new gold-district than any other in the state. "From the exceptional ores of the newly discovered quartz veins, many mighty hard-rock mines sprang up; the Empire, the North Star, the Brunswick, the Idaho-Maryland and others to follow, commanded the landsacpes above and minescapes underneath the ground for more than a century. September 9th, 1850, California becomes the 31st state in the union!

The original Eureka Mine (located in 1851) (on Eureka Hill), and the Idaho and Maryland mines were seperate mines which had one vein in common, known later as the "Eureka-Idaho-Maryland ore shoot." If not for this discovery, the Idaho and Maryland mines would likely not have been developed.

Eureka and Idaho mines

1863: Claim-filing for the Idaho Mine was recorded in May of 1863. But the veins were small and narrow, and the grade was poor and of low value. By 1865 very little more was discovered of workable value. In March 1866, all work stopped and the mine closed until September 1867. (Gold is worth $31.23)

In October 1865, the property was purchased and taken control of by investors, and the name changed to the Eureka Gold Mining Company. (Gold is worth $30.22)

(1869: Transcontinental railroad completion meets in Promintory Point Utah.) (Gold is worth $25.11)

1870: The Eureka mine reached its maximum production, and the main shaft reached 850 feet.(Gold is worth $22.88)

1872-74: The Eureka mine searched for new ore shoots, needed to be found to extend the life of the mine. Shaft sinking stopped at 1,250 feet, when quartz grade no longer warranted further production. (GIW $23.)

1873: During the Idaho Mine's four years of operation 1869-1872. As production slowly increased, water availability became an ongoing issue. Trees were becoming scarce! The Nevada County Narrow Gauge Railroad was begun to haul wood and other supplies in from Chicago Park and Peardale.

1877: Work at the Eureka was uspended. (GIW $ 21.25)

1878-79 The Idaho a new air shaft was dug to 1,100 feet, but the digging struck water, which required new pumps to remove. (GIW$ 20.67)

1880: The idaho reamined the richest and most famous mine in the state. Its surface plant and equipment ranked among the best in the mining industry. BUT, unmusual rainfall during April cause "considerable

flooding" as surface water entered the shafts of the Eureka and Idaho, ending up in the bottom of the mine, but the dewatering pumps could not handle the quantities,so the mill and mine were suspended until the water could be removed. The air cirulation at 1,000 feet level became inadequate.

1882: The CA state legislature banned hydraulic mining, which made further water storage dams and canals to be used for other purposes. The Idaho Quartz Mining Co., entered into a contract with the South Yuba water company to cover the mines needs.
---- (GIW, Gold is worth... AND shall remain at $22.67 until 1933, or for the next 51 years!)

1886: The Idaho ore shoot was heading toward a cross-over of the Maryland claim.

1889: On June 4, 1889, at the 1,000 foot level, workers discovered a fire in the shaft, and workers were esphyxiated or cut-off from assistance. Mine fires are serious because timbers are damp and smolder, filling the mine withtoxic smoke, carbon momnoxide and oxygen deficiency. The fire made underground workings impossible for over 43 days.

1890: The first water shortage to the mine happened in 1890, due to the collection of ice and snow in the water company's ditches. There was not eoungh water to supply both the Empire and the Idaho mines. -- On March 8th, the Idaho Quartz Mining Company brought suit against the Maryland Gold Quartz Mining Company, to determine boundaries between the two mines, which had actually been decided 20 years earlier. But the The Idaho company aserted the disputed line, was the Eureka-Idaho lode. An intrusion on this line, would actually cut into the Maryland (page 45).

1892: "The Idaho Mine was ranked the leading quartz mine in California from 1869 through 1892."

The Maryland Mine

1865: The Mining claim was located in June 1865, however no work was done until 1880, when the Maryland Quartz Mining Co., was formed.

1880-81: a primary tunnel was driven 675 feet to the vein, and then drifts were added. A hoisting works was erected East of the Idaho shaft, and a shaft sunk to 350 feet.

1893: SALE OF THE IDAHO MINE: By this time the Idaho mine had reached the compromise line agreed upon between the two companies in 1890.=, and no other ore bodies were found to dupport the Idaho any longer. Negotiation took place and the parties agree the Idaho Mine would be sold to the Maryland Gold Quartz mioneing Co., for $85,000.00. The agreement included the Maryland firm to buy ALL the equipment of the Idaho firm (page 52) , except for "money on hand, gold specimines in the vault and gold in the mill. A dual-management operation began on May 1, 1893 The mine's name was changed to the Idaho Maryland mine, although the company's name Maryland Gold Quartz Mining Co. would remain the same. This provided many advantages for the latter, including access to three successfulk ore shooits and a shaft down to 1,400 feet nd ll the necesary equipment [and ostensibly the 200 miners familiar with the immediate region. These were very positive impacts for Nevada City and Grass Valley!] "On May 12, 1893, a pocket of gold in large quantities were struck in Maryland ground, as was rick-rock on the 1,500 foot level which was unusually good."

1894: A severe fire damaged pumps, and water began collecting in the lower workings. Within a short time, their entire complex was engulfed in flames. Fortunately, all the miners escaped, but the major buildings succombed to the flames. The major concern was how much water would fill the mine before the pumps could be returned to working order.

3

1897

The Maryland Gold Quartz Mining Company

CAPITAL STOCK SHARES. 500,000.

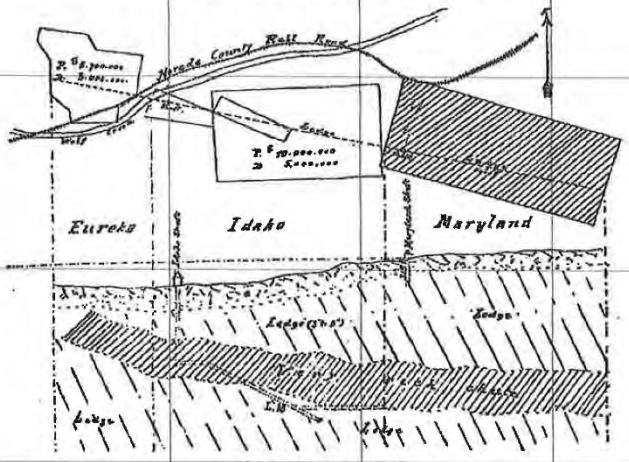
PAR VALUE PER SHARE: $20.00.

GRASS VALLEY MINING DISTRICT,

NEVADA COUNTY, CALIFORNIA.

Map showing the direction of the famous

EUREKA—IDAHO—MARYLAND LEDGE.



Scale—20 ohs. to the inch.

LONGITUDINAL SECTION OF THE VEIN.

FOR SALE.

40,000 SHARES AT $2.00 A SHARE

TO BE USED EXCLUSIVELY FOR THE DEVELOPMENT OF THE PROPERTY.

For further particulars and share subscription inquire of

S. P. DORSEY, Express Office, Grass Valley, Nevada Co.

1894: - THE DORSEY ERA. - The Maryland Co., took control of the mine on February 1, 1894.

1896: a good vein was found at the 1,900 foot level.

1897-1901: The Maryland Mine's major problem became insufficient capitl to maintain the underground workings, and, at the same time, develop new ore bodies. Money was raised that had tobe spent to develop new ore sources in underground veins. However, share sales did not bring enough money from outside sources. Mining continued for the next four years, but production declined every year. A few days before the mine closed in February 1901, a group of mining men conducted an inspection of the lower workings of the mine. "A report signed by the men, is quoted from their sworn statement on February 14, 1901: -- ***"We the undersigned, have made a personal inspection of the Idaho-Maryland mine, Grass Valley mining district, and in our judgement the ledge we saw in the east incline of the Dorsey shaft, and the levels from the shaft, is a continuation of the Eureka-Idaho-Maryland pay shoot of quartz, on its eastward and downward strike, in the regular fissure, and of good size, vis., two to four feet, and appears to be of good quality."***

In February 1901, the Idaho Maryland mine closed and was allowed to fill with water. There were several immediate causes for the closing; lack of capital to develop the mine; cost of triple-handling of ore, high milling costs owing to sporadic flow of ore to the mill, and poor conditions of underground workings. This ended 44 years of continuous mining of gold in this location."

1902: Idaho Maryland Development Company. Following the mine closure in 1901,Dorsey kept the surface workings intact. He became ctive in promoting the property. In late 1902, a group of men from Boston became interested in the mine, and sent a mining engineer who compiled a report which proved satisfactory to invetsors. The Idaho Maryland Development Co. was thus formed with a main office in Boston, MS.

1903: The Idaho Maryland Mine was bonded to the Idaho Maryland Development Co., who studied plans to reopen the mine 'with great enthusiasm." The plan decided upon was to reopen the Idaho shaft to the 1,000 foot level and then continue sinking the shaft into an unexplored region of the Eureka-Idaho-Maryland ore shoot. That shaft would terminate at the 2,000 foot level (page 67). However, the overall conditions of the surface and underground workings had deteriorated greatly under the Dorsey regime. The first things were the major repairs of the milling, hoisting and pumping system.

1904: In July, the surface repairs were completed and pumping commenced to dewater the mine. As the waters receeded, it became clear, the shaft timbers were in dire condition and in need of replacement. Due to cost, and time-consumption, the plan changed regarding sinking the Idaho shaft. Instead they would reopen the upper levels and hope to find enough gold to sustain operations while shaft repairs were underway. The 25 year old timbers had become crushed from swelling ground and deterioration. Many olkd stopes. for the next years, tributors work on the mine repairs. (p.79)

1906: San Francisco Earthquake:

1908: NEW ORE DISCOVERED. Two new ore bodies were discovered, which allowed the repairs to continue well into 1911.

1911: WOMEN'S RIGHTS AND THE 19TH AMENDMENT. One thing for certain, the IQMCo., did NOT overlook much ore in their workings, nor did the Development Co. find any new vein structures.

1912:

1913:

1914: *WORLD WAR I, , was an international conflict that began on July 28, 1914 and ended on November 11, 1918*

-- The IMDCo ceased operations in October 1914 at the beginning of WWI. The mine was again allowed to fill with water.

-- CONSOLIDATION BY ERROL MacBOYLE. "In 1914 the IM mine lay idle, with all its underground workings full of water. Late that year, a well-known mining engineer from San Francisco became interested in the IM mine." He made a full study of the mine's records, geology and history while an engineer at the CS Mining Bureau. His study of the mine convinced him that the mine contained vastly greater riches than the $19 million dollars it had yielded prefious owners. He also planned to consolidate all the surrounding mines together with the IM. There was sound engineering in this idea, for veins into adjacent properties cannot be followed. That is why the Empire and North Star companies of Grass Valley had for many years a standing offer to purchase the properties contiguous to their properties. (pp. 72-73.) He knew the Empire, North Star and Idaho-Maryland had sound profitable ore at much greater depths. He arranged to acquire the Union Hill mine, and created the Gold point Gold Mining company. Later, Gold Point Consolidated Mines, Inc was formed to take over, syndicate and acquire additional mines. "The main thrust of the company being to reopen the IM mine!" But, being wartime, raising capital was very hard to acheive. (see 1917)"

1915: PANAMA PACIFIC INTERNATIONAL EXPOSITION

1916:

1917: During 1917 the Metals Exploration Company of New York, acquired the controlling interest In Gold Point Consolidated Mines, Inc. After months of negotiations, one by one, properties were leased with options to buy, including the Eureka, Roanaise, South Idaho, Black Hawk, Union Hill, Gold Point, and Idaho Maryland mines, and several other mining claims. the land involved extended over two miles in length on the Eureka-Idaho-Maryland lode, and embrassed an extensive vein system, the greater part of which was in virgin ground. (see 1919*)

1918: PROHIBITION AND THE GERMAN FLU: "The flu pandemic of 1918-1919 killed between 20 and 40 million people." -- REOPENING THE MINE: A Busy year."

1919: The Eureka mine did not actually become part of the Idaho-Maryland until 1919. *The last property which MacBoyle added was the Idaho Maryland on december 20,1919. A plan then evolved to develop the combined properties. Metals Exploration Co., acquired controlling interest of the combined properties and advanced the funds to equip, open and develop. The name of the new venture was "Idaho Maryland Mines Company." The Metals Exploration Co., intended a new vertical shaft central to the Union Hill, Gold Point, Black Hawk and South Idaho mines for their development. The Idaho Maryland's surface plant was antiquated and had to be completely replaced. So the new shaft idea, was consequently bandoned and the Idaho shaft was reopened and and deepened to the 1,000 foot level, to explore the Eureka Idaho Maryland vein below the thousand foot level.

-- 1919 mine strike: When Metals Exploration took over the consolidated groupo, the Union Hill was the only one in opertion. The plan was to focus on the Lucky Cambridge at 600 ft, the Gold Point vein at

800, croscutting the the Georgia vein at 300. However, the underground work came to a HALT June 13, 1919, when district miners called a generalk work-stop and strike of ALL mines, which lasted two-weeks, during which time water in the Union mine rose to the 600 foot level. Ooperations were permenantly suspended and the mine was allowed to continue to fill with water. All employees were terminated! On June 30, a settlement was reached with the miners. The new wage scale gave miners $4.40 per hour, muckers $3.85, lamorers $3.85 and shaft-men $4.85.

-- 1919 - Rebuilding the surface plant and reopening the Idaho shaft, was the next order of business. The Union Hill plant had become available for processing, and was completely dismantled and moved to the Idaho Maryland site. and changeover from water-power to electricity was made. a 75 foot headframe was erected over the shaft collar. The shafts required vst retimbering for a depth of nearly 400 feet. Dewatering the shaft began September 24, 1919. Huge pumps and piping and other repairs and improvements were necessary, as well. It took threemonths to empty the main shaft to 1,000 ft.

THE 1920S: THE ROARING TWENTIES, PROHIBITION begins Jan. 17, 1920, (ends Dec 5, 1933), and WOMEN'S VOTING RIGHTS.

1920: Reopening the Eureka mine. The Eureka had been worked from the mid-1850s to its closing in 1877. Left behind in the mine, was a great deal of low-grade ore, which it was planned to re-run the materials to recoup minerals. Thus, the water was removed from the Eureka mine simultaneously as the the rebuilding of the I-M surface plant and dewatering of their shft. Underground connections were made between the two mines. But after the time, effort and cost of reopening the Eureka, they found no ore of usable grade, which was very disappointing. It was the most defeating feature of the re-development plan of 1920-21. It proved two things: 1) that the sources who believed there we 50,000 tons of $10 per ton fill rock and unmined ore remained in the Eureks mine were unreliable, and,2) superintendant Watt had not left ANY GOLD in his mine over four-decades earlier. As well, considerable amounts of waste rock had been dumped into the main shafts, as well.

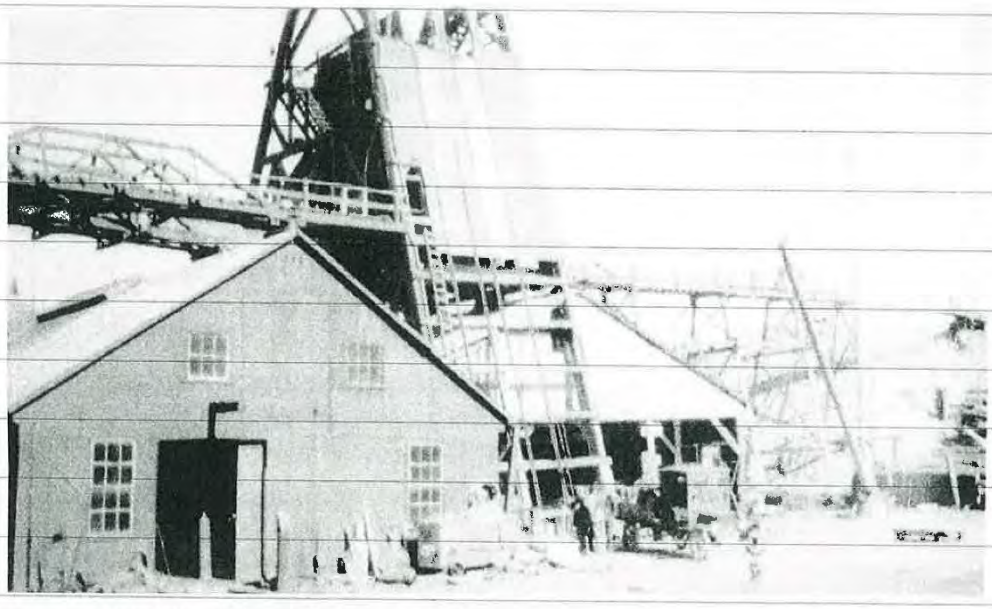
1920: Idaho Maryland surface plant. The surface plant was designed for 100 tons of ore per day and wascompleted by year's end.

1921: All operations in the Eureka ended in late 1921! Water was allowed to refill the shaft to 600 feet, where it periodically overflowed into the Idaho shaft periodically. The plans for the tailings had to be approved by the California Debris Commission before construction and operations were begun!

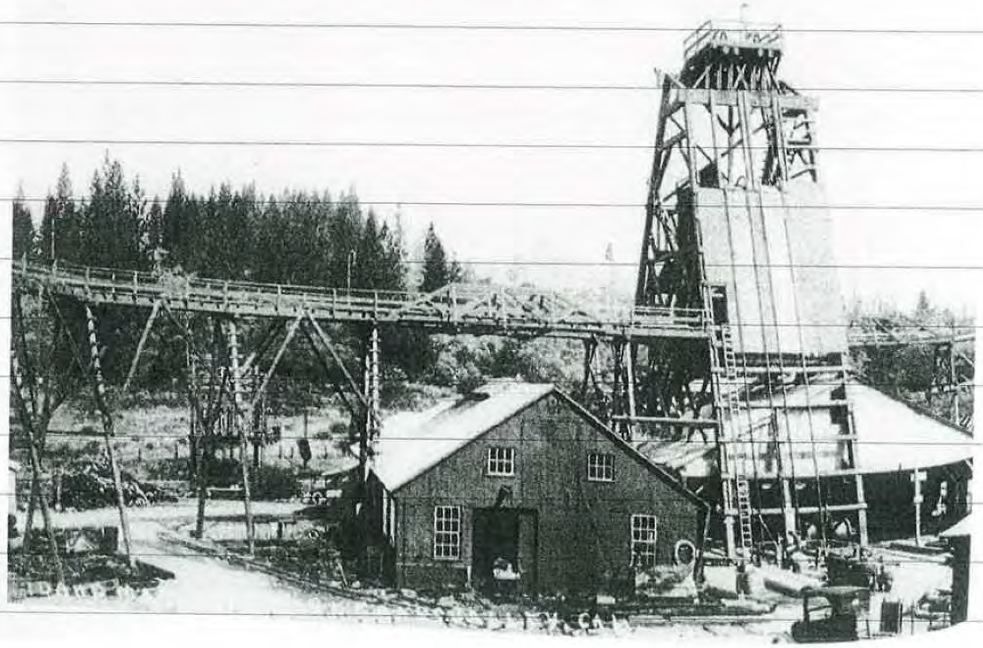
1921: The Miner's Progressive League. In early June 1919, a miners strike had been called against ALL GOLD MINES in the Grass Valley District. But a year later, no changes had been made and in June of 1921, no workers showed up for work beyond hoistmen and pumpmen. No final agreement was made, however, the contract period would extend to June 30, 1922. Surface operations in 1922 are seen in the

photo: I-M headframe.

1920's



Two views of the Idaho Maryland shaft and headframe, along with overhead ore and waste trestles, as they looked in the 1920s.



1922: UNDERGROUND MINING. The upper levels of the Idaho Maryland mine were not considered to be favorable for finding ore. Tributers attempted to "give it a try," but this part of the mine had been thoroughly "stoped" * between 1865 nd 1893 by the Coleman Brothers and again when tributers worked the same area between 1904 and 1914 under the Idaho Maryland Dvevlopment Co. But the digging provided a second escape route out of the mine through the pump shaft. *(*An underground excavtion along a vein from which ore is being, or has been extracted, as distinguished from other excavations such as drifts, raises or winzes.)* A crosscut which turned out to contain massive porphyrite. Between 1,00 and 1,700 feet they ran into a distinct schistose developpment of amphibole schist. "There were no veins structures of any significance found." A strong fissure was found to exist and in places the vein opened up to eight feet in width, but on the whole, the vein was very erratic and very low grade. The gangue mineral consisted entirely of calcite, dolomite and allied minerals, but NO quartze or gold.

-- ADDITIONAL PROPERTIES ACQUIRED: In August 1922 the mine added other properties, the Grant claim, East Eureka claim, Bastian homestead, and the John H. Hansen property. as wellk as the controlling interest in the Black Hawk mine and patents covering the East Eureka and 15 other claims. An agreement was also signed with the Brunswick Consolidated Gold Mining company for rights under the Union Hill group of claims.

--1922 UNDERGROUND OPERATIONS: Many various, crosscuts, searches within the mine tunnels and fissures, at many and varying levels and areas of the mine(s) were found to be mostly low grade stringers in diabase. And, the 1600 foot level was quite disappointing for finding ore. The Canyon shaft ws lowered to 2,122 level on the incline. Generally quartz and gold discoveries remained disappointing through the year.

1923: SURFACE OPERATIONS: The surface plant was generallky in good order, much of which was relatively new. The sawmill was active for underground timber needs. Only 140 men were working the big mine at th time. The mill operated only part time with 15 stamps, as ore would be found, mined, and sent topside.

1923-24; UNDERGROUND OPERATIONS: Work was mostly done in the mine at the lower levels of the mine between 1,000 to 2,000 feet depth, mostly around 1,500. But nothing in the way of value was found, including the so-called Morehouse vein. At 2,350 foot level, the quartz veins were of very low grade material and could not be mined for profit.

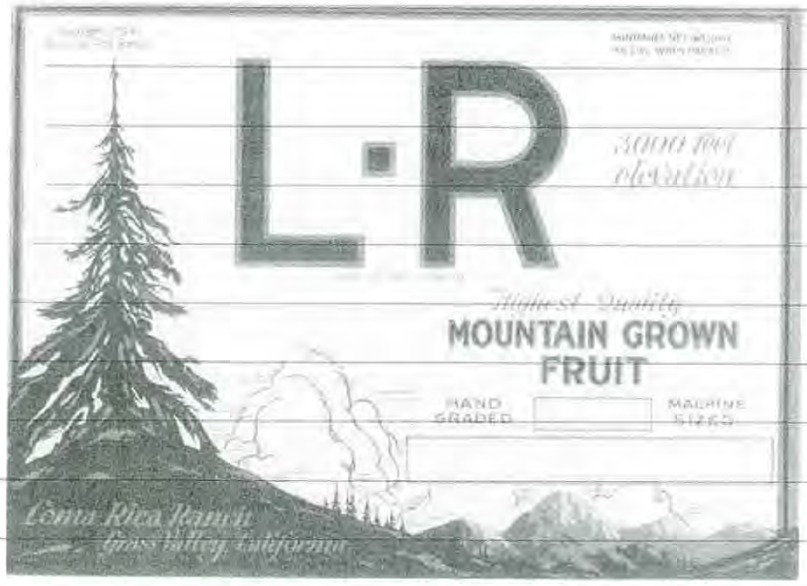
1924: MANAGEMENT CHANGES: Management of the mine changed and the Superintendant wrote in his report: "The efficiency of labor was very low, particularly during the summer months and toward the latter part of the year. The men underground have a fast and set rule as to what embodies a day's work. with this set rule of timed effort on the man's part, and the well-known evil of excessive high-grading (thievary of high-grade ore samples fromm the mine,) at every opportunity, a constant vigil must be kept at every working place. Because of this, an excessive number of bosses must be employed. The above conditions result in high operating costs and low labor efficiency." (as well has high-grade mineral losses.) Some good ore continued to be mined from the 1900 foot level during 1924. And even with continued digging winzes* and sampling, "nothing of any value was dicovered." (*Winze: a vertile or inclined passage that starts from an underground level and and connects to one or more lower levels.) Sadly, the mine failed repeatedly to locate profitable lodes for processing. The I-m mine, with its associated mine-acquisitions and efficient mining proceedures, lost $300,000. for the year.

1925: MINE CLOSING: On February 27, 1925, ALL WORK stopped and the Brunswick Consolidated Gold Mining Co., notified to discontinue their option. The mine was shut down in April 1925 and was left to refill with water. " For six months prior to the cessation of work in April 1925, the available rich ore had been "gutted out" of the mine in anticipation of the closure." From January of 1919 to to

7

September 1925 (7 years) over $2,250,000 was expended on the purchase, reopening and development of the consolidated properties. During the same time, only $200,000 was taken out in the course of operations. (p. 97).

-- IDAHO MARYLAND CONSOLIDATED MINES, INC. The holding company was incorporated in the state of Nevada for three-million dollars and was called the Idaho Maryland Consolidated Mines, Inc. in September 22, 1925 in Carson City, NV. Following the closure of the Idaho-Maryland mine in 1925, Errol MacBoyle set out to raise money to keep the pumps going and prevent the underground workings from filling with water. He was certain the gold mine would be a good producer if properly operated. Two long-time friends loaned him the money to keep the mine operating. First a holding company was formed to acquire the holdings of the Metals Exploration Co., which consisted of over 700 acres of of land that included the Eureka, Idaho Maryland, Union Hill, Gold Point, Black Hawk ans South Idaho mines. The purchase was in excess of $2.5 million dollars.



In spring 1926, Errol MacBoyle ordered a fruit-crate label for pears on his Loma Rica (Rich Hill) Rancho.

1926: START OF OPERATIONS: Most of the equipment from the 2000 foot level had been removed, and timber repairs were neglected in several areas. Further deterioration of underground workings took place between the time operations were suspended (in 1925) and when the new the new Idaho Maryland Consolidated Mines company took over. -- When the actual operations began on January 1, 1926, under MacBoyle's management it was estimated to take six months and $50,000. dollars to open the underground workings so that ore bodies would become accessible. It also was estimated that an additional six months and $50,000. would be needed as an operating fund to carry the properties until enough ore was produced to keep the mill working at its capacity of 2,000 tons per month. But the former miners from the site, secured "tribute pitches", or leases and went right to work, which greatly reduced start-up cost, and and expidited the reopening. Twenty-five men were selected, and divided into six

leasing compan ies each with a specific block of ground, on three of six known veins. The other three reserved for company operations. The tributers also agreed to pay for half the powder used and all the worker's compensation insurance. The mine had been rejuvinated by May, mand the costs of rejuvination was $18,000. The tributing program worked, and by June 1926, there had been 2,000 tones of ore milled, enabling the mill to start work sooner than anticipated. Shifts were Night and Graveyard shifts, leaving Day shifts so as not to interfere with hoisting. Between Marck and December, the mine milled 10,415 tons of ore.

1927: Tributers Operations: The tributers program proved a saviour for the minc as well, during 1927, most of which was mined by the tributors and kept the mill running nearly all the time. The ore mined in one particular area was stoped from 6-8 feet wide, and even though the quartz was only two feet wide, the altered diabase and serpantine carried course gold and heavy sulfides. Not all of the groups were equally fortunate. Several other tributor leases found almost no ore in several locations. Recovered ore proceeds were not enough to cover and sustain continued operations.

1927: COMPANY OPERATIONS: Over a period of month concerns were raised about the loss of ore in the mill tailings. The consensus was to add "Fru vanners" to capture the finer sulfide particles from the slime. These engineers alsoagreed that Idaho Maryland ore "could not be treated efficiently by the flotation process." The decision was made to use ball-mill crushing and then flotation. The mine kept attemptingto follow new leads, but most turned out to be short-lived, and we abandoned or discontinued for development of other areas. So, ore production decreased in the latter part of 1927, attributed to several facttors. Bullion sales for the year were valued at 491,000 and concentrates totalled $109,088. (Fru Vanners: *https://en.wikipedia.org/wiki/Vanning*).

1928: UNDERGROUND OPERATIONS: In January of 1928, was found that MacBoyle called "It is one of the strongest and best looking veins ever opened in the Idaho Maryland or other mines in the district. " It was a vein that had been close to discovery by two other mining groups earlier, who stopped short of it, and it had not been again tested since 1924. All work on other company veins halted to focus on this new one. -- TRIBUTORS: During that year, the number of tributers was reduced to only twelve men and was confined to the Morehouse vein. The ore averaged $8-10 per ton. -- Surface operations: In July the headframe began to settle and moved. All mill and underground work were halted until repairs could be effected. This included truing the headframe, extensive concrete work and repairing and retimbering tunnels.

1929: In January new financing was sought to further develop active veins, explore for others, expand mining facilities and reopen the Brunswiick mine. MacBoyle spent a great deal of time in New york and San Francisco seeking further investment dollars. Money was tight at the time, and his attempts met with failure. The IMCM, inc, sold $500,000. in comon stock. The shares became available April 16, 1929. The stock market crashed in October, and triggering the Great Depression of the 1930s. From August of 1929 to 1933, The Great Depression was a severe worldwide economic depression that took place mostly during the 1930s, beginning in the United States. The timing of the Great Depression varied around the world; in most countries, it started in 1929 and lasted until the late 1930s. As a reult, the mine stopped other work, and focused on the No.1900 ore body exclusively. -- UNDERGROUND WORK: In February, all tributes or leases were terminated, with the exception of two. The company focused their entire attention upon the No. 1900 vein throughout 1929. It also became necessary to rebuild the wooden hedframe, due to its age and weakened condition, with many timbers showing cracks and dry rot. It had been used at the Union hill mine, then dismantled and moved to the Idaho shaft by Metals Expolration Co. Underground mining was discontinued for nearly a month and resumed in late SeptemberWater pumps were operating daily as other repairs were continuing. -- MILLING OPERATIONS: There were 17,241 tons milled during 1929 with a recovery of $155,for an average of $9.04 per ton.

THE 1930S: THE DEPRESSION AND THE DUSTBOWL

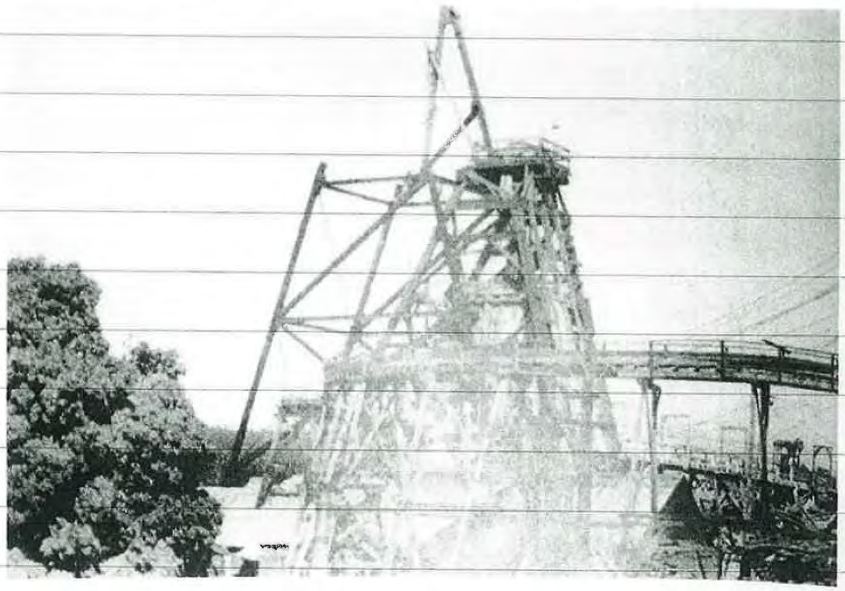
1930: UNDERGROUND DEVELOPMENT: (and worker's compensation insurance:) and MILLING OPERATIONS: Mining operations continued to be a problem. Experiments to reduce the tailing losses were unsuccesful.Inefficient milling capacity began to create restraints on underground ore production, and this kepot the overhead cost at $10. per ton. In October the company began modifying the Brunswick mill, in order to double ore production.

1931: MILLING OPERATIONS: The Brunswick 20 stamp mill began operation in January with only marginal success. Tailing losses were still high. **"The Kraut flotation cells were perfected to handle this specific type of ore,and especially the TALC in the ore!"** -- UNDERGROUND OPERATIONS: The vein numbering system was changed in 1931; the original Eureka-Idaho-Maryland vein was changed to the No.1 vein; the Dorsey vein was changed to No. 2 vein, and the No. 1900 vein was changed to the No. 3 vein, and the NEW footwall branch of the No 1900 vein became No. 4 vein.

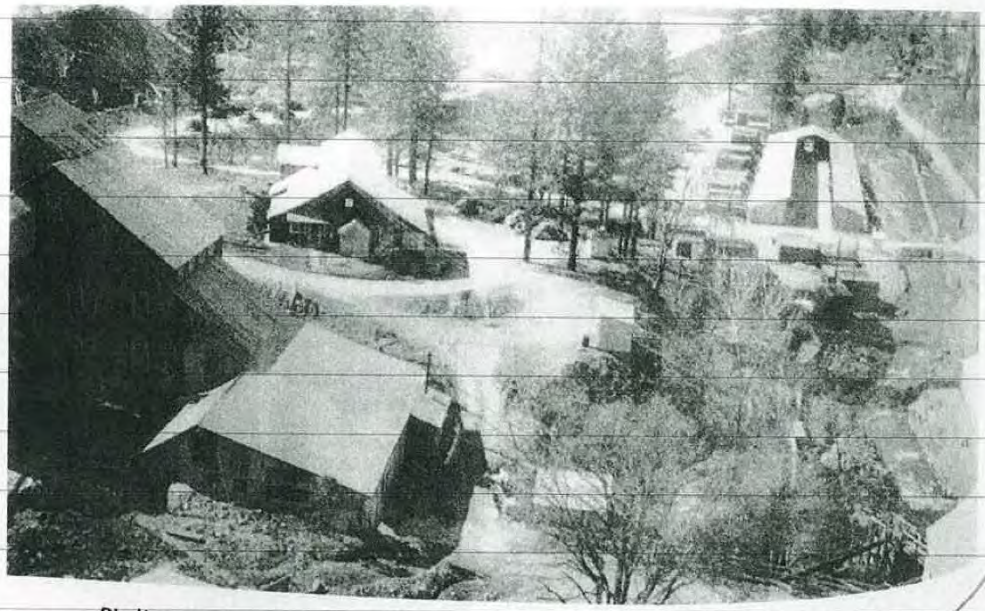
1932: SURFACE WORK: In 1932 the corporation made great strides in upgrading the surface works. a locomotive train of ore cars were added to move materialthe NC Narrow Gaughe ran a spur onto the mine for the delivery of lumber for the mine and mill. A new 105-foot high steel headframe was erected. a 200-ton-capacity ore and waste car was constructed on the East side of the head frame to remove material. added to remove material. Underground mining was halted while the other work was done. But on November 1, 1932 as 200 men returned to work the tunnels and mill opoerations. -- UNDERGROUND OPERATIONS: As the year continued, a major problem came about in the form of "economic handling of waste rock." General technical improvements were added to help in greater recovery of ore and concentrates. -- FATAL INJURY: On December 8, 1932, Frank Bennett wqas standing on a ladder, and came in contact with a 4,000 volt electric wire and fell about ten feet to the ground. He had received severe electrical burn on his left arm and hand as well as serious head injuries. He died that evening without regaining consciousness." (page 124). PRODUCTION: during 1932 58,245 tons of ore were produced, 37,000 of which were milled at the New Brunswick plant, and 21,000 tons at the Idaho Maryland mill. The gross gold AND SILVER recovered from both mills was $449,470. The average loss in the tailings at both plants was $1.14 per ton, or $66,400. for the year. Total expenditures for the year were $456,000. The profit before taxes, depletion,depreciation or interest-on-debt owed to the Idaho Maryland Consolidated Mines, Inc, was $470,172.00. (Therefore, at $20.67 Price of Gold nationally, The mine(s) yielded 22,746. ounces of refined gold. *[Divide this by 58,245 tons of ore, results in 2.5 ounces per ton. (https://onlygold.com/gold-prices/historical-gold-prices/]* Gold was $20.67 per oz. in December.

1933: (In 1933, as part of legislation to stabilize gold value during the Great Depression, the Mint stopped producing gold coins. The legislation also banned private ownership of gold coins and bullion. The law changed in 1974, but the Mint no longer used gold for circulating coinage.) (Loma Rica airport started:) -- Errol MacBoyle took a six month leave of absence from the mine, with full pay beginning January 10th, "for his conscientious devotion to the corporation for six years without taking a vacation." The mine was forced to cease operations for a week in late January, due to a lack of water. The Cascade ditch had become clogged with ice and snow, cutting off water flow to the mine reservoir. At the same time, 4' to 6' snow drifts closed the roads between and around the I-M (Idaho Maryland) and Brunswick mill. -- **DEVELOPMENT WORK: For reasons of underground waste-management, slowing development of new ore sources, the proposition was forwarded to sink the New Brunswick shaft to a depth of 5,000 feet. Dire needs for better air-circulation at the lower depths became a paramount concern.** -- Reopening the Brunswick mine in 1933: In July, the IMMCorp leased the Brunswick mine from the IMCons.M, Inc., for a five year term. This agreement included,"a royalty of 10 percent of the gross recoveries of gold and other precious materials, with a minimum royalty of $500 per month." The task of reopening the Brunswick mine began August 15th, with months needed to reopen the caved-in tunnels and other demands, employing workers three shifts a day, six days a week. The mine also had to

ADDED 1932 STEEL HEADFRAME



Steel headframe being constructed over existing wooden headframe.



Bird's-eye view of the office, sand dam, timber storage, and employee garages next to Wolf Creek. Idaho Maryland Road is at far right.

be dewatered, and other major rebuilding needed to be performed, as well, including significant retimbering. The payroll rose to 300 employees in 1933 due to the demands upon infrastructural improvements. The annual profit that year was $296,083. But, the operating company had debts of $3,500,000. to pay off. **(GOLD IS WORTH, for the first time in 51 years, $32.32,** not, $20.67)

1934: The year began with Prohibition ending after 13 years. (December 5, 1933) (Gold was $32.32 per oz. in December 1933). -- **"On January 30, 1934, President Franklin Delaon Roosevelt devalued the dollar and gave the world a standing offer to buy gold according to the needs of the international trade. He fixed the value of the dollar at 59.06% of its former equivalent, and on this basis a price of $35 an ounce was established for international dealings in gold."** -- Errol MacBoyle was certainly pleased with the $14.33 increase in gold's value! In August, Mr. MacBoylr was elected the new chairman of the new board!

-- NEW MILL AND CYANIDE PLANT (and process!). Despite heavy debt, continued improvements were incorporated into the mine and it's collive merged properties. The cyanide plant became operational in March and the concentrates from both mines were processed right away. The 'fines' were reground from #35 mesh screens to #100 mesh at the mill. These concentrates were then pumped into the threelarge cyanide treating vats containing dilute solution of sodium cyanide. The cyanide dissolved the fine-gold, allowing the other minerals to fall m out as waste material.The gold percipitated out of the solution by adding zinc dust. The zinc combined with th cyanide, displacing the gold, which settled out as finely divided particals. The precipitate solutions were pumped to the refinery section at the conclusion of the cyanide process. Final treatment occured in the refinery for separation, reduction and retorting, to emerge at last as the finished product -- the gold brick!

-- "ROUND HOLE SHAFT: By 1934 the underground orkings had extended eastward over 8,000 feet (1.3 miles) from the main shaft. Therefore a decision was made to sink another shaft, closer to operations. The new shaft would provide better ventilation a second exit, and to reduce time getting men back to work areas. Th shaft location was to be at the corners of Idaho Maryland road and Brunswick. The site presented geological problems, because the rock formations consisted of serpantine, goudge, ankerite and gabbro. A nornal square shaft, would reguire blasting, frilling, and considerable timber to maintain. but because the shft would not be used to hoist ore nor waste-rock, the shaft would be a single-compartment using a 60" (5') diameter experimental core-drill, which was fabricated at the I-M shop. Water was provided to keep the drill cooled. Some cores measured nine feet in length. The "round-hole shaft" advanced 173 feet in 1934. (It was completed in March of 1936, at 1,125 feet in depth.) The serpantine wall rock remained stnding without any timber. *[Photo of two of the 60" cores taken April 2, 2022 at the corner of Brunswick and Whispering Pines Roads.]*

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1934 - DEVELOPMENT WORK: Development in the various shafts, tunnels and raises, totaled 12,488 feet, from which 32,380 tons of ore were produced. Of this total, half were driven at the I-M mine. A total of 5,601 feet were driven at the Brunswick that year. Also, during the year, numerous mine accidents took place, most consisting of falling bodies of rock in the shafts and tunnels, hitting unsuspecting miners before they could get out of the way. Most died of their injuries.

1935: Errol MacBoyle to the U.S. Bureau of Mines Advisory Board. On July16, 1935, Idaho Maryland Consolidated Mines, Inc. merged with its operating compny, Idaho Maryland Mines Co. This streamlined the corporate organization under which the properties were owned and operated, resulting in a more economical and efficient organization. The name of the organization was changet to "Idaho Maryland Mines Corporation, under the laws of the state of Nevada. Further injuries and fatalaties continued into late 1935. (Gold remained fixed at $35.00 per ounce.)

1936: During the year the corpotation entered into a lease-purchase agreement with Errol MacBoyle for the operation and maintenance of the Loma Rica ranch and other properties thereby relieving the corporation from expense and liabilities for their operation. Mineral rights under the ranches were retained by the corporation. Loma Rica translates to "Rich Hill." Of constant concerrn were the problems of fresh-air circultion throughout the collective mines underground, and clearing and replenishing clean air on a full time basis to the 1,300 foot level and beyond, across hundreds and thousands of feet laterally throughout the underground acareage.

1937: Wages and working conditions, opened the year, as labor unrest began at about the same time, as laborers and mine-workers goals were to replace the previous "league" as the sole agency for the purpose of collective bargaining for wages and working conditions. The comopany closed the Old Brunswick mine on April 5th, stating the ore therein was marginal and the closing was for economic reasons. The union said the closing was "a lockout of 80 union workers." (page 158).

-- THE LOMA RICA AIRPORT: Started in 1933. By law, the gold and silver was to be shipped directly to San Francisco to the U.S. mint, as required by the National Gold Reserve Act. Errol MacBoyle, created the airstrip specifically for the safe transportation to Mills Field, later renamed the San Francisco airport."

-- HIGHGRADING: "High-Grade: (1) Any rich rock or ore, usually quartz with visible free gold in which an abundant amount of gold is showing; (2) To steal gold from a mine. "High-Grading; " The theft of specimen gold by mine employees. "high-grader" One who steals and sells or otherwise disposes of high-grade or specimen gold.

-- STRIP SEARCHING MINERS: "An interesting aspect of the (legal) hearing dealt with 'highgrading," which was explored extensively. Several men expressed strong disapproval of the "double-dry" system that the m ine(s) used to minimizing high-grading. It was stated that miners were required to remove their work clothes in one room then walk naked to the shower room, then walk naked to another room where their street clothes were hung. It was no deemed unreasonable to have rules to prevent high-grading, but miners felt it was undignified to compel men to strip, as they had to do at the mine. This system was practiced at nearly all of the mines. Deputy State minerologist John F. Bongard, minc investigator for the U.S. Bureau of Mines, testified that he and U.S. Secret Service agent Charles B. Rick had been investigating illegal gold transactions throughout northern California. He stated that two men from Nevada County had been convicted as part of an illegal gold-buying ring. He indicated that high-grading was wide spread, ranging from $400,000 to $500,000 each year. He estimated the yearly amount of high-grading from the Idaho Maryland and Brunswick mines to be about $250,000." ("Gold in Quartz," pages 158-159).

-- PRODUCTION (1937) Combined production of the Idaho marylnd and the New Brunswick mills averaged 1,000 rtons daily, the I-M averaged 300 tons daily, and the New Brunswick averaged 700 tons. Over the past year, 305,107 tons of ore were produced from Grass Valley opertions. (excludes Forbestown and bullion mine figures...) Numerous questions had been asked by stockholders regarding the ore reserves, continuity of ore bodies, and the life of the mine. The latter question was answered by MacBoyle in this manner: *"As to the probable life of the mine, from 1926 to date (1937), the Idaho Maryland properties have produced approximately $15,000,000. Most of this amount has come from above the 2,000-foot level, from extensions of old veins and ore bodies, or new veins being found. From a geological standpoint we believe that many new veins and ore bodies will be discovered in the large area of highly mineralized zone now controlled by the company. In the past the Idaho Maryland veins and ore bodies have always been larger, more continuous and richer than any other in the district. In view of the fact that other mines in the district are now working at of 10,000 feet on the vein (laterally), and and vertical depths of over 4,000 feet, as compared to depths of 2,000 feet at the Idaho Maryland, there was every reason, geologically and otherwise that the Idaho Maryland-Brunswick properties would be profitably operated for years to come."*

1938: (Orsen Welles broadcasts "War of the Worlds.) The unusually harsh winter weather caused considerable damage at the new Brunswick mine. Several sections of the trestles that supported the tailing flume between the Idaho Maryland mill and the tailings were blown down in February winds. The surface properties of the company at this point comprise a solid block of 2,180 acres, or about 3.3 square miles. -- For several years the ultimate objective had been to connect the I-M and New brunswick mines together underground. Finally, in 1938 development funding became available and the 8,000-foot-long project was started. Work began drifting east on the No. 1 vein near the No. 30 winze on the I-M 2000 foot level. The reasons for connecting the two mines together underground were to provide an emergency exit from the lower lrvels of both mines, and to have the ability to provide natural ventilation and to service both mines from either shaft. The long drive would also explore the downward projection of several Brunswick veins.

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1939: (September 1, 1939 WWII begins.) Costly curtailment of mining and milling operations had occured in past years because of heavy snowfalls clogging the Cascade ditch and cutting off water flow to the mine reservoir. -- During 1939 the large Loma Rica reservoir was constructed to alleviate the above problems. Thjis 13-million gallon reservoir had sufficient storge to meet ll water needs, especially in the event of a watyer outage. A large power shovel was used to dig the reservoir, and mine personnel were used in all phases of construction. the reservoir was constructed at a cost of $30,258. The reservoir served the Old Brunswick, New Brunswick and Idaho maryland mines. It also provided water to the Loma Rica Rancho. A rock walkway extended out over the water to a glass-enclosed gazebo. The valves controlling the various pipelines were located beneath the gzebo floor. -- The major unusual expenditure for the year was for sinking the New Brunswick shaft from the 1500-foot level to the 2400-foot level, and concurrently extending the 2000-foot level of the Idaho Maryland to connect with the vertical shaft at the New Brunswick 2300-foot level. THIS REFLCTED THE GENERAL OPINION THAT NEW ORE WOULD HAVE TO COME FROM THE DOWNWARD EXTENSION OF VEINS NUMBERED 1,2,3,4 AND 5." (page 172). To explore these setionsit was necesary to dewater and retimber the No. 30 winze. It had been sunk 850 feet on the incline to the 2400-foot level, just before the metals Exploration Co. closed the mine in 1925 (14 yers earlier.) Very little mining had taken place at that time, and the winze had to be allowed to be filled with water. -- **PRODUCTION: According to government reports the I-M mines Corp had the largest largest gold production of any quartz mine in California during 1939. The corporation was the second-largest gold mine in the United States. The number of employees had increased from 781 to 831.**

THE 1940S: WWII and the Gold Rush 100 year anniversary.

1940: The greater shaft depth and anticipated production meant increasing the (135 foot steel) headframe size and hoisting capacity. Then in May, the compny embarked upon modernization of the New Brunswick surface plant. National defense need took precedence over over private industry for all available steel, so the headframe improvements were postponed several times until the following spring. Other many and varied projects were affected during this time. -- Following the connection of the two mines, the waste rock from the nNew Brunswick shaft-sinking was trammed over to the Idaho shaft. Thjis permitted greater hoisting time in the New Brunswick shaft. Mine water from below the 2300-foot level was pumped to that level and allowed to flow in an open ditch to the Idaho shaft, where it was pumped to the surface. Several levels were explored but the vein was barren, and the assays were very disappointing. At Christmas, nonetheless, 950 employees received Christmas bonuses. -- PRODUCTION: For the second consecutive year, the U.S. Bureau of mines reported the I-M Mine Corp, was the leading gold producer in California, with approximately 1,000 tons of ore milled daily.

-- Since Errol MacBoyle took over HIS mine in 1925 (18 years earlier,) over two-million tons of ore had been produced with an approximate value of $28 million dollars. *"This tonnage, and developed ore reserves, were developed as a consequence of successful exploration, conducted under a program through which the owner's capital was subject to a relatively high risk of loss. The development program was conducted under the guidance of a competant staff, and backed by the ardent faith of management." - (Author- Jack Clark)* --- [Pat's note: During the past several years, management also co-operated/worked-with a couple other outside mines, including one in Butte County and the Bullion mine in the Grass Valley District. Reporting on these entities is confusing, and played a small role in the overall history of the I-M Mine, therefore I did not take the time to add their data. Purchasing the book "Gold in Quartz," can provide this and other detailed and confusing data to my, this, presentation. The focus here is chiefly on the I-M mine specifically.In late 1940, I-M Mines Corp. investors purchased the bullion mine- Pat]

1941: (December 7th,1941 The United States 'joins' the war after Pearl Harbor attack.)
Entering 1941 the I-M Mines corp., was at it's peak. The combined number of employees (three shifts per day) at the I-M, Brunswick and Bullion mines was 973, and additional miners were being hired. The New Brunswick shaft had reached 3,000 feet in depth.The mine owners were willing to recognize the Mine Workers Protective league as the sole authority to bargain for its members, and agreed to recognize no other union as a bargaining agency for employees. Shortly afterwards in April, 310 I-M Mines Corp. workers convened to discuss the Wage and Hour Administrations order for a forty-hour work week, beginning May 1. The company workforce had increased to over 1000 employees when the strike had occured. War had begun in Europe in 1939 and , although the U.S. had remained officially neutral, it was providing arms to Great Britain and Russia under the lend-lease agreement. In 1940 U.S. polikcy shifted from neutrality to 'preparedness.' The Selective Service Act was enacted to build up the nation's military. Defense plants began building ships, tanks and airplanes, along a multitude of other war materials. Government priorities were quickly placed on steel, explosives and other products needed for the preparedness efforts. Men took advantage of their (strike) time off, to seek higher paying jobs in the shipyards, defense work in Hawaii or in other manufacturing plants. The mine payroll was reduced by 60 , lost to defense work or armed forces enlistment. -- The completion of the new 135-foot-high New Brunswick headframe was able to be erected over the existing 85-foot headframe, because its footprint straddled to older tower, thus, production could continue with minimal interruption. -- On December 7, 1941 the U.S. was drawn into war with japan, accelerating the loss of manpower from the mines to defense industries, over 200 menhaving laft over the preceeding eight months. In December, the I-M Mines corp., finally took full ownership and possession of the Bullion mine.

1942: COMPLETION OF MODERNIZATION: The Brunswick mill was put back into operation in January, after a seven month closure. The mill was completely rebuilt inside during the shutdown during closure. construction of a large concrete ore bin within the confines of the new headframe began during April 1942. It was circular in design and was divided into two sections, the larger portion for ore and the smaller section for waste rock. The structure rose 90 feet above the ground, and the interior was lined with heavy steel rails to protect the concrete from wear. A large shute and diversion gate were located between automatic skip-dumping rails on the headframe and the two bins. This was to direct the ore or waste to the proper storage bin. The large concrete storage bin, often referred to as the 'silo," was because of its unique shape, was completed in mid-June. The corporation sought to include strategic or essential materials in its production, and pursued a diligent search for tungsten in the Union Hill veins within the Brunswick mine, but no profitable deposits were found. The corporation also took an optionon a quicksilver mine near San Jose in the New Almaden district. A fair grade of cinnabar ore was found at the surface, but the deposit was too shallow and lost its commercial value, so the option was dropped. -- The exodus of miners and other key personnel increased dramatically following the Pearl Harbor attack. This affected the underground production and the selection of ore to be mined. Government restrictions on the purchase of pipe, rail, drill steel, explosives and mining equipment also had a great impact upon the gold mining industry. The company's low priority-rating was a major concern in obtaining materials. The management policy always had been to maintain an even grade of ore to be milled at both mines by the lower grade of rock with the higher grade of ore. This made it possible to keep tonnage high by including the marginal grade rock while still making a profit. The life of the mine was also extended by this practice. Now in 1942, the company was being forced to mine ONLY the higher grade ore to offset the decline in production. The New Brunswick shaft-sinking operation was stopped in the early year at a depth of 3,470 feet, far short of the goal of 5,000. Many of the development headings in both mines had to be suspended, and the miners were transferred to work in stopes to keep production flowing.

-- GOVERNMENT MINE CLOSURE - 1942; ON OCTOBER 8. 1942, the War Production Board issued Limitation Order L-208 which closed down all the major gold mines, and also stop all milling of previously broken rock within 60 days. A minimum number of employees were permitted to remain for

General manager Neil O'Donnell and Errol MacBoyle in front of MacBoyle's house.

Errol MacBoyle in front of the stables at Loma Rica Rancho in 1944.

These photos, taken eight months after the government-imposed L-208 closure during World War II, show major damage below the 2400-foot level—80 percent of the Idaho Maryland drifts were caved.

(1944, PAGE 204)

pumping water and for other essential operations. Prior to the issuance of L-208, the I-0M Mines Corp., payroll had bee reduced from 800 employees in December 1941 to just 212 on October 8, 1942. The average ag of the remaining employees was 47.7 years and 43 of the underground workers were 50 years or older. The year 1942 was a hectic one for IMMCorp., as there was a 700% drop in net earnings, with dividends suspended in February.

-- MINERAL MINING ATTEMPTS: Late in 1942, magnesium was needed for the war effort, so the corporation began developing a process to remove magnesium (magnesia) from serpentine rock, which is a silicate. But, for various reasons, little came of the plan due to slow governmental action well into 1943.

1943: *(To help the war effort by eliminating copper from U.S. pennies, the United States Mint came up with a new metallic composition for the one-cent piece. They decided to use steel for the base metal and plate it with pure zinc. Unfortunately, zinc oxidizes over time and turns into a dull and dark gray color.)* MacBoyle spent three months in Washington C.C., in an effort to lift the ban on gold mining, but to no avail. The IMM Corp. kept close to 100 employees on the payroll between the L-208 closing date and June 28, 1943, if only to keep the two mines dry and pumped-out and the main shafts open. When those costs became too high, the payroll was reduced to 60 employees (whereas, in April 1941, it was 1000 workers.) An inspection of the underground levels of the Idaho Maryland was conducted eight months following the closure. In that period of time much of the timber had been weakened by decay and the swelling serpentine ground. A general failure of timber could be seen throughout the mine. Nearly ALL levels showed more than minor damage. At this rate of decay and timber deterioration it was highly questionable whether much of the underground workings would be accessible whenever the mine was allowed to reopen. Unlike the I-M, the Brunswick underground workings, were in good hard ground, with much less damage. -- On October 23, 1943 Errol MacBoyle suffered a stroke which paralyzed hthe right side of his body. He required constant medical care because of his illness. His stroke may have been caused in part by his efforts to reopen the gold mines and obtain approval of the magnesium process. He had spent considerable time in Washington D.C lobbying the two causes.

1944: MINES REOPENED ON LIMITED BASIS: Through efforts of the American Mining Congress—and the San Francisco Chamber of Commerce mining commitee, arrangements were made with the War Production Board (WPB) permision was given to survey the damage sustained by the sustained closures of the Grass Valley mining district.In the inspections, it was found that that major damage had occured in the lower levels of the mine at or below the 2400-foot level, that **80% of the Idaho Maryland drifts were caved-in**! On May 3, 1944, after 17 months of forced closure, the Idaho Marylnd and the Empire Star Mines corporations were grantedpermission to regruit sufficient miners to produce up to 7800 tons of ore per month, to offset the costs of keeping the mines open. The work force was limited to 200 men who were required to be over the age of 40 years or older. The agreements also carried a provision that wages shall be the price of gold shall be fixed unless there is an increase in the price of gold above $35. per ounce. Mining resumed exclusively in the Brunswick mine, where mill rock was more easily obtained. Recapture and timber repair began at the I-M mine, mainly to keep the 1000 and 2000 feet levels open.

1945:
-- ERROL MacBOYLE LOSES CONTROL OF THE COMPANY 1945. *[This part of the story in long related to finances and control, not mining, so I plan to skip this subject, in order to focus on the history of the physical mining history... Pat]*

-- (Atomic bomb dropped on Hiroshima on August 6, 1945. Nagasaki August 9, 1945. WWII ends September 2, 1945)

-- In the of 1945, as the war in Europe was nearing an end, on Julu 1, 1945, the War Production Board lifted its Order L-208. This permitted gold mining companies to resume operations. There was now a housing shortage in Grass valley and Nevada City caused by an influx of people working at Camp Beale and DeWitt hospital in Auburn. Hiring workers for the mines was gradual, and by the time Japan surrendered in September 1945, the total work force had reached only 100 men. The lack of qualified miners and timbermen continued to plague the company. A sawmill was constructed in the fall of 1945, located south of the I-M mill near East Bennet road, and a substantial log-pond was erected. The sawmill was capable of making lumber for the mine and for sale. As men were discharged from military service, and b y defense contractors, many returned to mining. By the end of 1945, the payroll had risen to 241 men. Most of the men were placed at the Brunswick mine, where mill rock was readily available. Timber crews were assigned to the 1000-foot and 2000-foot levels in the I-M to recapture the drifts that sustained major caving during the shutdown. Due to te extensive swelling, only only the most experienced miners who were used to this dangerous type of mine-work, were chosen. During 1945 there were 2368 feet of new development headings advanced and 543 feet of cave-ins were recaptured.

1946: (Ten more years before these mines will all be closing.)
--Errol MacBoyle, REGAINS CONTROL after arduous legal bttling, returned to his leadership role to the dominant position he had held from 1926-1945. In April of 1946, the Empire-Star mines, inc., suspended all mining operations. A total of 128 men at the Empire and North Star mines were terminated subsequently, leaving only 35 men to keep their four mines free of water. Most of the laid-off men were hired by IMMCorp. --

Due to the losses of so much of the higher value ore reserves in the IMM during the wartime closure, it now became necessary to increase development operations to find new ore bodies.(p.212) To compensate for the loss of the higher grade ore from the Idaho-Maryland and for the inflamatory costs, incumbent on management to increase the tonnage of the lower grade Brunswick ore.

1947: SHORTAGE OF MINERS, and ANOTHER UNSANCTIONED STRIKE: The lack of skilled miners during the postwar erapresented a large problem for management The timber industry had begun to flourish, and many miners quit mining during the summer monthsto fall timber, and then return to the mines during the off-season, which became a great disruption for the mines. -- In May, there was a "wildcat strike" at the New Brunswick on May 8, 1947. "A miner was discharged (fired), when he came to work on the night shift. High-grade ore was found in his "underground" clothes by one of the watchmen, while the clothes were hanging in the dry room. The night shift walked off the job in protest to the firing. At an evening meeting, the accused gave his side of the story that the "gold had been planted in his clothing." The miners present decided not to return to work unless he was reinstateed. The next day, several other miners were also fired, which caused picket lines at BOTH mines! The company thus fired 30 miners. Days later 88 men crossed the picket lines nd went to work. The walkout ended therefter. The current crew of 450 men was able to produce the tonnage equal to the amount of the 800 miners in prewar years. The underground work in the I-M mine during 1947 occured mainly in nthe No.1 and No.2 mines at the 2700-foot level. Also, the new sawmill proved to be very efficient, with a total of 12,201,546 feet of material, so much so, it necessitted the building of a new sawdust burner.

1948: **GOLD RUSH 100 YEARS : January 24, 1848, the "Gold Rush" began 100 years ago.** In March 1948, the Public Utilities Commission issued an order for all heavy-power-consuming industries to reduce power consumptionby 20%, because a winter drought had slowed generation by hydroelectric power plant. The mines were forced to cut back to a five-day work week. This was the first time Saturday was not a work day, cutting time-and-a-half, and reducing the payroll by one-third. This impacted hundreds of miners and local businesses. By mid-year, only four areas of the mine(s) were working. Recapturing accessable ore, became too expensive to execute. In October all work in the I-M mine, with the exception of the 2700-foot level came to a top, and all the miners were moved to the Brunswick mine. In the Brunswick underground, 3,500 feet of rail and pipe and tail were removed, with veins tht were too narrow and the grade of quartz too low to mine. Mining seemed to be facing a stiff decline in the Grass Valley region. Two miners were killed by falling rock and a blasting accident.

During 1948, the company produced over 20,000 tons LESS than the previous year, and the mines showed less value for the year, as well as deprecition, depletion, amortization of patents, as well as the sawmill losing money, added to the shorter work-week and fewer miners. (GIW: Gold was then worth $40.50 per ounce.)

1949: Entering 1949 there was a great need to reduce costs, requiring a reduction in personnel, and leasing-out a large portion of the Brunswick mine. The mine removed all the broken in in the various stopes (holding mareas in the mine), before turning it over to the leasing prties. Lease hol,ders furnished their own lbor, insurance and explosives. Th IMMco., provided tools, timber, hoisting and milling. The lessees received half the of the value of gold produced in their area. The company maintained their rights below the 1600-feet level including the 2700-foot level in the I-M mine, as well as the workings at the 3280-foot level.

-- DEATH OF ERROL MacBOYLE: Errol MacBoyle died in his sleep on November 4, 1949 after a long illness that followed his stroke in 1943. MacBoylewas the one person MOST responsible for the Idaho Maryland Mines Corp. becoming one fo the leadinging gold producers in nthe U.S. His faith in the mines and his perserverance in times of adversity, he was able to succeed when others had failed! He left behind a legacy for the Grass valley-Nevada City community, where "the people' wer foremost in his mind. The I-M's sawmill was subsequantly leased to an outside interest, and the Brunswick sawmill was also sub-let.

THE 1950S: THE BABY BOOM; (Korean War starts 1950, ends 1953.)

1950: The brunswick's old headframe was weakening from dry-rot and age, and a new steel replacement was erected. Leases in the Brunswick continued. -- UNDERGROUND FIRE: On Labor day afternoon, September 4, 1950, a pumpman descended the Idaho shaft to the 2000-foot level to check the pumps. he could smell smoke, so returned to the surface. He alerted the superintendant and safety engineer, whom, when they arrived at the I-M mine-head, the smoke was visible. No one was underground in observance of labor Day. The fire was found to be caused by faulty electrical cables, which were damaged by a falliing timber, and the dampness of the wood restrained a greater ignition. The fire was ended several days later through quick and effective fire-response.

--CORPORATION LOSSES --1950: During 1950 there were 193,357 tons of ore treated at the two mills, with measurebla eturns of both gold and silver. The company operations and the lease-holders produced altogether $1,110,823. But the operating costs added up to $1,306, 347., ending in a loss of $37,414 dollars beforecharges for depletion and depreciation. After all charges were applied, over $216,000. was lost. At the end of 1905, a total of 364 men were employed by the company, above and below ground. In addition, 102 men were employed by seven leases.

1951: THE BEGINNING OF THE FINAL DECLINE: A general change in management of the directorate took place in March 1951 amidst new aoopintments and retirements, including members who had been friends of MacBoyle since 1926 and 1944, and some as far back as 1915. In underground operations, several former source-veins were dipping uniformely into 'virgin' ground where the gold ended. And the quantities and qualities of new discoveries were nothing like the past decades. Operations during 1951 were largely directed toward exploration and possible development of new-found ore bodies, primarily at the 2700-feet and 3200-foot levels. The expeniture for development in 1951 was twice what it had been the year before in 1950. The decision was made to only mine and prosess the higher-grade ore(s) and leave the lower-grade in the mine, in hopes that the market price of gold might raise, or, if American gold were to be release to the free market, the corporation might be in a ;position to go back to retreive the low-grade ore. -- PRODUCTION: There were only 262 men left employed by the IMMCorp., at the end of the year, and most occurring ore was being milled in the New Brunswick mill. Th IM mill only operated part-time. After depreciation and other charges, the net incomewas $31,384., and the sawmills were showing a consistent loss.

1952: NATIONAL NEED FOR TUNGSTEN: After five years of simmering tenions between North and South Korea, the Korean War started on June 25, 1950, whereafter, the American government announced a program to stimulate production of critical, strategic materials in the U.S. The General Services Administration began a purchse program for tungsten, which would run until 1958, or until a supply of three-million units took, place, which ever came first. Small amounts of 'scheelite' were often found in certain veins of the Brunswick, but always lost in the course of mining and milling gold ore, a "loss," management said, "which could add up to *thousands of dollars* each year." Based upon the selling-price of tungsten of $65. per short-tonunit of 60% tungsten content would be an estimated loss of $1.75 per ton.

Subsequently, the goal was put forth to a connection be dug at the 3280-foot level, connecting the mines at the 2830 foot point, a connection which would connect the two mines together at their lowest levels, providing greater air circulation, a second exit, and less costly movement of ore. Once this was accomplished, all mine leases were ended, as costs related to milling had risen beyond being profitable. The same was true of the lumber mills, which alo proved to be losing money again.

1953: -- DECLINING REVENUES, HIGHER COSTS: Develop work continued, but due to the worsening financial situation, development dollars were limited. The mill was always hungry for ore, and management was always clamoring for higher millheads. To conserve blasting powder, began charging contract-miners nine dollars per box to offset prices. The mill was cut back to two shifts per day, and six-days a week. The I-M cyanide plant had to be closed and the concentrates were sent to a smelter in Selby. During 1953 a greater effort was directed at finding scheelite in amounts sufficient to warrant installation of a pilot plant to test a process for full-scale milling.

-- MANAGEMENT CHANGES CONTINUE: President and General Manager Bert Clase resigned unexpectedly in June. The I-MMCorp., joined other gold mining companies in a request for remuneration by the government for the damages sustained as a result of the forced mine closures during the 1942-45 war years. I had become apparent by October 1953, that opperating losses were depleting the working capital to a critical point. One proposal suggested was "a reduction of surface and underground employees from 150 to 90, which meant a coresponding decrease in the consumption of power, supplies, water, insurance, wages, payroll and other general expenses overall. Several parcels of land in the compny's extensive holdings were, not considered important to mining operations were sold off. The IM lumber mill buildings and equipment were sold off, but not the land. The corporations also failed to pay both 1953 and 1954 tax obligations, in hopes future in hopoes that future operations might improve whereby the could catch-up.

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1954: UNDERGROUND OPERATIONS: Twenty-two miners were rehired in February, bring the total employees to 115.=, with mining being done in several locations. Exploration during the year at the 2700-foot level was unsucessful at finding any new ore. -- MINING OTHER MINERALS: Exploration for scheelite continued, and finally sufficien amounts were found to justify the installation of a small tungston milling process. The refind mineral shipments to San Francico slowely proved worth the time, expense and efforts. This was good news, as the poor profitability of gold mining with a low price for gold, and the high cost of processing and operating costs, was making it questionble whether gold mining companies could even continue to operate. (Gold in 1954 was $35.25 per ounce.) The management, stressed by cash-flow, discussed other mining prospects, including potential Uranium and Vanadium mining in Colorado Utah... The company also, at this time, decided to take a loss by abandoning some properties, to reserve cash. Other properties were thusly sold-off, as well. All the marketable timber on the mining properties was sold, and capital stock in the company were liquidated s the market would bear, to help continue operations. --OPERATIONS: During 1954 there were 88,632 tons of ore procesed, compared to 153,634 in 1953. All the ore was hoisted and milled at the New Brunswick site. The lower output was partially due to the decrease on work force from 193 to 114 men.

1955: (November 1, 1955 Vietnam War begins) FINANCIAL WORRIES CONTINUE...: Development funds were dwindling as 1955 opened. Aside from tunghston exploration, all gold mining was performed in the lowest levels of both mines. In February a drastic cutback was made in the employee base, leaving only 60 employees between both mines. --TUNGSTEN MINING: By mid-May, all gold developoment work had stopped and only tungsten exploration was active. In September, a ignificant amount of tungsten was discovered, and some value was gained through it's sale. Tungsten being found, became a short-term financial rescue for the failing IMMCorp coffers. The tungsten ore body in the Brunswick mine was situated within clos proximity to the union hill mine, had been full of water ince it's closing in 1919. This became a major concern. **THE MINING AND MILLING OF GOLD HAS CEASED DECEMBER 27, 1955 AND ALL OPERATIONS TURNED TO THE PRODUCTION OF TUNGSTEN.** The cost of steel, explosives and upplies used in mining had risen to the point where gold mining was no longer profitable. Unlike other businesses, there was no way to pass on the increased costs to the consumer. The price of gold was fixed at $35.00 per ounce ($35.15...), and it was sold directly to the U.S. Mint in San Francisco. IMMCorp. suffered devastating losses in 1955.

1956: THE YEAR OF REINTRENCHMENT: Now that gold mining had ceased, the future of the mine focused entirely on the development of tungsten mining. Men began removing equipment, trolly motors, ore cars, mucking machines, drills, hoses, slushers, etc from all levels of both mines below 2,000 feet level and including the 3280-foot level. All pumps were left in place and pumping continued. The 45 winze between the mines was aslo llowed to flood after all the equipment had been removed. The tungsten mill had been completed in March 1956 and had a capacity of 74 tons in 24 hours.

On September 25, 1956, orders were received from the board of directors to seace nearly all tungsten production, abandon the Idaho shaft, and allow both mines (all their associated diggings), including the Brunswick 1450 level. This action would reduce the number of employees to an absolute minimum consistent with with the above program. Subsequently, the above ground plant of the Idaho Maryland mine was sold to Oro Lumber Company. That sale included the mill, cyanide plant, headframe, hoists, compressors and several buildings, the the same company who had purchased the lumber mill previously.

Subsequently, the Union Hill, Brunswick and Idaho Maryland mines were were ordwred by the California Division of Industrial Safety to close all mining leaving only a skeleton crew to remove and sell-off equipment.

(Above) New Brunswick mine in March 1956. (Below) Same view in 2004.

Cover page of sales brochure for the 1957 auction of New Brunswick mine equipment.

1957: -- A SUCCESSFUL AUTION:
After the mine closed a salvage crew continued to remove all equipment from underground. On March 15, 1957, the last cage of of items was hoisted to the surface in the New Brunswick shaft. The electrical power to the mine was then disconnected from the substation. These two great gold producers became a casualty of the los price of gold and an inflated economy that left gold mining in its wake. On April 30, 1957, Nevada County Tax-Collectors announced the news that the county of Nevada and two school districts had received a check for $102,291.98from the IMMCorp., for payment of local taxes. Then, beginning on May 21, 1957, a two day auction was held to liquidate the reminder of the equipment. The auction was a huge success. -- (The "Gold in Quartz" Book ends at the close of 1957.)

THE END

1958:

1959:

THE 1960S: THE COLD WAR
1965 BEGINNING OF THE GAY RIGHTS MOVEMENT
July 20, 1969: moon landing

THE 1970S: PEACE, LOVE, DOPE and WATERGATE

THE 1980S:

THE 1990S:

THE 2000s:

THE 2010s:

THE 2020S: REOPENING THE IDAHO-MARYLAND MINE?

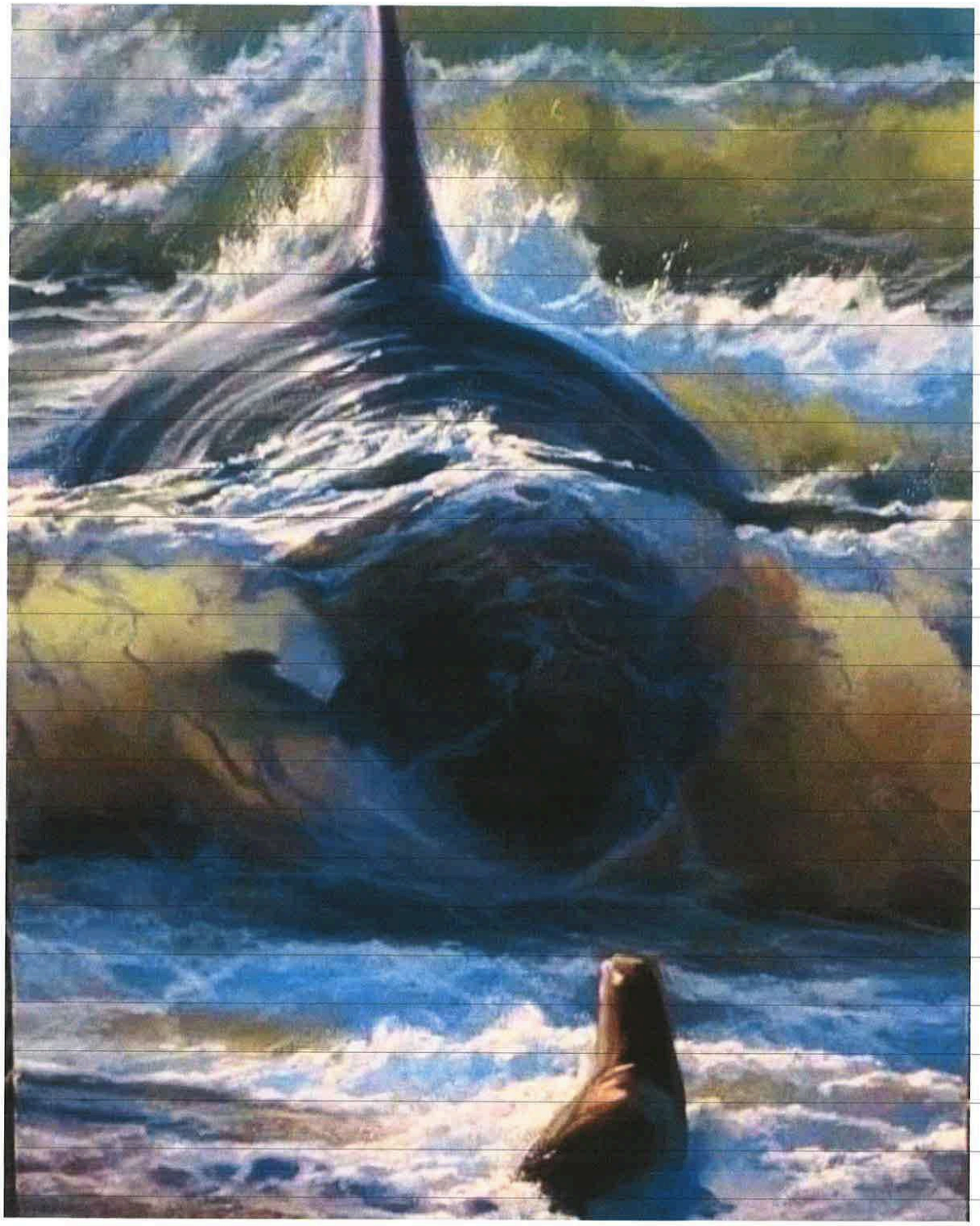
2021:
2022:
2023:

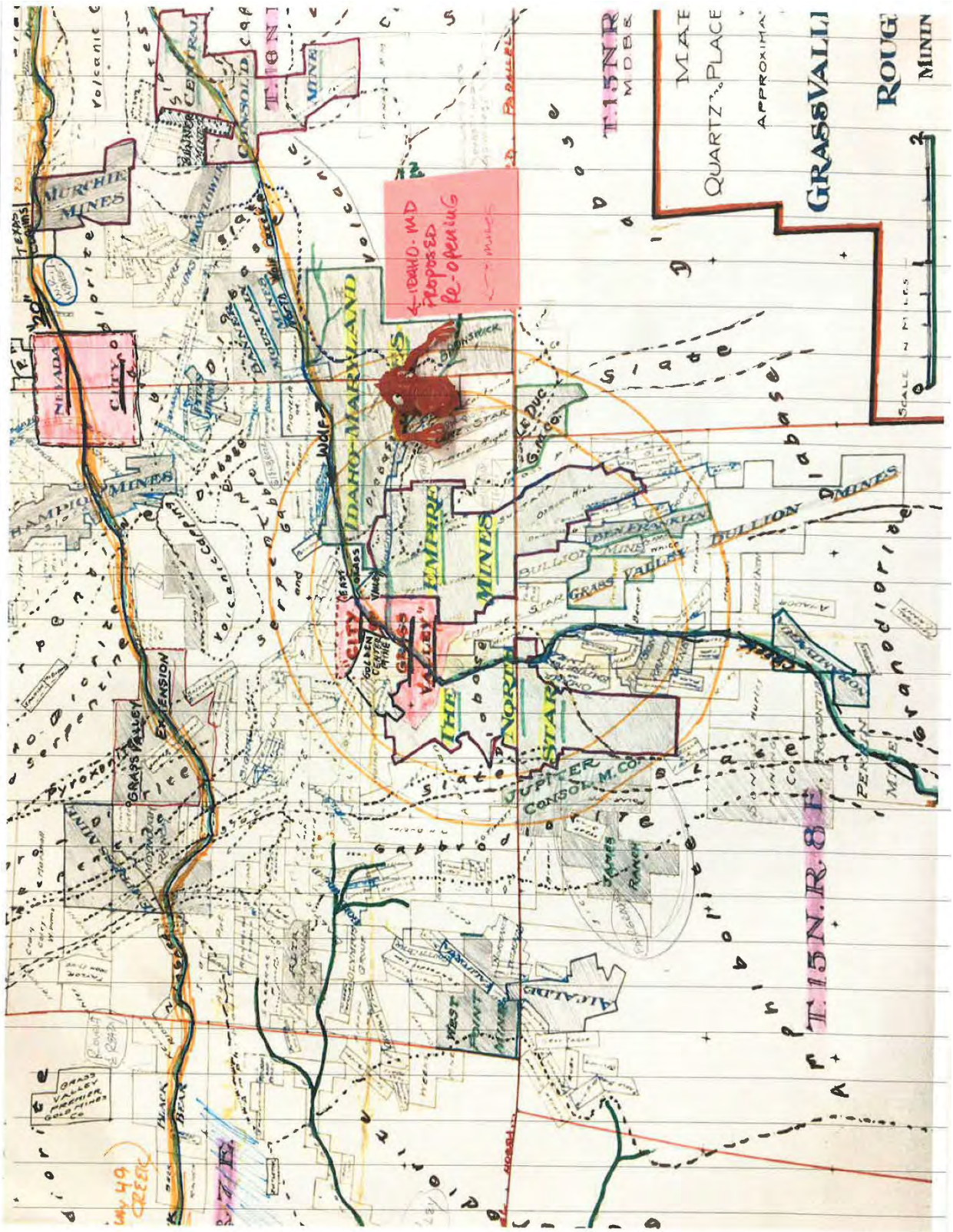
https://www.mynevadacounty.com/DocumentCenter/View/14900/Loma-Rica-Ranch-Report-PDF

https://www.cagenweb.org/nevada/data/nccorp_index.html

Guide to the Empire Mine State Historic Park Collection
http://www.parks.ca.gov/pages/1080/files/fa_383_001.pdf

"RISE GOID— HAS A PIAN "




IDAHO-MD PROPOSED RE-OPENINGS
IDAHO-MARYLAND
EMPIRE MINES
NORTH STAR
MURCHIE MINES
HAMPTON MINES
BEN FRANKLIN
BULLION MINES
GRASS VALLEY
NEVADA CITY
T.15N.R.8E.
T.15N.R.
QUARTZ PLACE
GRASSVALLEY
ROUGH
SCALE 2 MILES
JUPITER
CONSOL. M. CO.
JAMES RANCH
WEST POINT MINES
GRASS VALLEY PREMIER GOLD MINES CO
Volcanic Series
Slate Graywacke Series

INDIVIDUAL LETTER 785: THOMAS JACOBSEN

Response to Comment Ind 785-1
The commenter provides information and resources related to the gold mining industry and local history, but does not address the adequacy of the DEIR. The comment has been noted for the record and forwarded to the decision-makers for their consideration.

Response to Comment Ind 785-2
The comment appears to be primarily focused on airborne asbestos and water quality concerns related to the proposed project. For asbestos, please see Master Response 22 – Conservatism Used for Asbestos Assessment and Master Response 23 – Adequacy of Asbestos Sampling. For water quality concerns, please see Chapter 4.8, Hydrology and Water Quality, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 785-3
The comment very generally expresses concerns related to underground water resources and quality of life. Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Quality of life concerns are outside the scope of CEQA – please see Master Response 1.

Response to Comment Ind 785-4
The commenter notes observations of common wildlife species on the project site. Please see Response to Comment Ind 585-18.

Response to Comment Ind 785-5
Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 785-6
Please see Master Responses 1 and 2 for quality of life concerns, which are outside the scope of CEQA.

Response to Comment Ind 785-7
The DEIR found that all traffic-related impacts of the project would be less than significant after mitigation, with the exception of the impact to the intersections at Brunswick Road and State Route 174 (level of service impact) and Brunswick Road and Sutton Way (queueing impact), which would be significant and unavoidable even after implementation of mitigation. (DEIR, p. 4.12-56.)

Response to Comment Ind 785-8
The comment is outside the scope of CEQA – please see Master Responses 1 and 2.

Response to Comment Ind 785-9
Please see Master Response 8 – Mine Waste Characterization and Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 785-10
Please see Master Responses 1 and 2 for quality of life concerns, which are outside the scope of CEQA.

Response to Comment Ind 785-11

Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 785-12

The comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers.

Response to Comment Ind 785-13

The comment appears to express general opposition to the proposed project and does not address the adequacy of the DEIR. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration.

Response to Comment Ind 785-14

The comment appears to express general opposition to the proposed project and does not address the adequacy of the DEIR. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration.

Individual Letter 786

From: Tom Krauel
To: bdofsupervisors
Subject: Idaho Maryland Mine Proposal
Date: Tuesday, March 8, 2022 2:04:08 PM
Attachments: Idaho Maryland Mine signed letter.pdf

not County residents

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Ind 786-1

Please review the attached letter of opposition to the Idaho Maryland Mine proposal.

Thank you for allowing us to comment.

Tom and Nancy Krauel

3/5/2022

We are currently looking at the Grass Valley area as our area to retire and spend the rest of our lives in. Our plans are on hold until we see a decision on the Idaho-Maryland Mine Proposal.

Major decisions are based appropriately on risk verses benefit. The benefits of moving forward must outweigh the risks.

Have you honestly weighed the risks verses the benefits of the Idaho-Maryland Mine Project?

Benefits:

1. Jobs and any growth associated with those jobs provided
2. Potential improvements in infrastructure

Risks:

1. Potential ground and surface water pollution
2. Potential air quality degradation
3. Encroachment and impacts on nearby wetlands
4. Loss of open space environment
5. Increased traffic
6. Housing shortages
7. Increased cost of living by greater demands on current resources
8. Worse medical care due to greater demand on current providers
9. Worsening crime by by a sharp increase in population and strain on current resources
10. Population increase, which degrades the local environment
11. Loss of local character due to all of the above
12. Loss of appeal due to loss of character and all of the above
13. Population demographic changes as families exit due to loss of appeal and quality of life
14. Loss of tourism

Ind 786-2

Clearly, the risks outweigh the benefits.
Please stop the Idaho-Maryland Mine Project from moving forward.

Thomas and Nancy Krauel
T M F/C 3/8/2022
Nancy Krauel 3/8/2022

380 County Road 73
Alturas, CA 96101
crowderflat@hotmail.com

INDIVIDUAL LETTER 786: THOMAS KRAUEL

Response to Comment Ind 786-1

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Ind 786-2

The comment does not address the adequacy of the DEIR, but rather expresses general concerns related to the project, some of which are outside the scope of CEQA (e.g., housing shortages, increased cost of living, loss of local character, loss of appeal, loss of tourism) - please see Master Response 1 and Master Response 2. Regarding water pollution concerns, please refer to Chapter 4.8, Hydrology and Water Quality and Master Response 35 – Discharge to South Fork Wolf Creek. Regarding air quality concerns, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Climate Change. Regarding wetland impact concerns, please see Chapter 4.4, Biological Resources. Regarding increased traffic concerns, please see Chapter 4.12, Transportation. Regarding concerns about increased crime, please see Chapter 4.11, Public Services and Utilities (see Impact 4.11-2 concerning law enforcement).

The comment expresses general opposition to the proposed project. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration.

Individual Letter 787

From: Tom Maher
To: bdofsupervisors
Subject: Rise Gold Mine
Date: Saturday, February 12, 2022 4:40:14 PM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 787-1

I am absolutely opposed to the opening of Rise Mine in Nevada county. I am a voter of this county since 1983. I have paid property taxes and sales tax here all these years. I believe the mine opening will harm our air quality as well as our traffic and water quality. Water is a precious resource and should not be used on mining in this county. Sincerely
Thomas Lawrence Maher
16142 Sharon Way
Grass Valley Ca 95949

Sent from my Verizon, Samsung Galaxy smartphone

INDIVIDUAL LETTER 787: THOMAS MAHER

Response to Comment Ind 787-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns related to the project - please see Master Response 1 and Master Response 2. Regarding water pollution concerns, please refer to Chapter 4.8, Hydrology and Water Quality and Master Response 35 – Discharge to South Fork Wolf Creek. Regarding air quality concerns, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Climate Change. Regarding traffic concerns, please see Chapter 4.12, Transportation.

The comment expresses general opposition to the proposed project. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration.

Individual Letter 788

From: Thomas Prato <tom@boxpower.io>
Sent: Monday, April 4, 2022 4:27 PM
To: Idaho MMEIR
Subject: Idaho Maryland Mine

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Hello Matt,

Ind 788-1 I am emailing you today to express my concern regarding the reopening of the Idaho Maryland Mine. I am VERY concerned about the proposed plan to pump out groundwater of the existing mine and the effects that the continuous pumping will have on streams and the available groundwater for residents. Many residences in the area get their water from wells, which could be negatively impacted by the removal of millions of gallons of ground water. I am additionally extremely concerned about the conduct of individuals in the company Rise, who had previously filed for bankruptcy due to damages resulting from environmental violations.

Ind 788-2 All in all I think the potential consequences of reopening the mine FAR outweigh any potential benefits.

Best,
Tom

Tom Prato | Senior Project Engineer
530-802-5477 ext. 714
12438 Loma Rica Dr, Suite C Grass Valley, CA 95945
www.boxpower.io

1

INDIVIDUAL LETTER 788: THOMAS PRATO

Response to Comment Ind 788-1

The comment does not address the adequacy of the DEIR, but rather expresses concerns related to groundwater impacts. Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 788-2

Please see Master Response 3 – Operator Responsibility.

Individual Letter 789

From: nursefrench2004 <nursefrench2004@aol.com>
Sent: Sunday, April 3, 2022 8:46 AM
To: Matt Kelley
Subject: Idaho Maryland Mine project

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3 April 22

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Mr. Kelley,

I would like to take the opportunity to voice my opposition to the proposed mining project led by Rise Gold Corp.

Ind 789-1 I am a Grass Valley native and have grave concerns about this proposal. I do not believe this is what our community wants. I'm concerned that the benefits of the project would not be for our local citizens.

I'm afraid the jobs created for locals would be minimum wage, manual labor positions while the higher paying salaries will go to a small, select group of outsiders brought in by Rise Gold Corp.

Ind 789-2 The environmental impacts of the project are extremely concerning. The EIR did nothing to satisfy my concerns. I believe it is in all of our mutual interests to make sure any mining operation in our area will be held to the absolute, most highest environmental standards possible. I do not feel like this is being done.

I am not impressed by the reputation and past business practices of Rise Gold Corp. I do not want my beloved home town left with the mess created by a foreign company with absolutely no invested interest, other than profit, in the well-being of our area.

Ind 789-3 I respectfully ask you to consider my concerns.

Thank you sincerely for your time.

Tiffany French
15421 Gary Way
Grass Valley, CA 95949

1

INDIVIDUAL LETTER 789: TIFFANY FRENCH

Response to Comment Ind 789-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration.

Response to Comment Ind 789-2

The commenter states that the environmental impacts of the project are extremely concerning, but does not identify specific impacts of concern. Thus, no further response is required nor possible. Please see Master Response 1.

Response to Comment Ind 789-3

Please see Master Response 3 – Operator Responsibility.

Individual Letter 790
Dist 3
Tiffany Graves

THANK YOU FOR YOUR SERVICE TO OUR COMMUNITY. PLEASE

RECEIVED
MAR 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

I HAVE LIVED IN GV 30+ YEARS - MOST OF MY LIFE. MY PARENTS LIVE IN CHICAGO PARK, INLAWS ARE IN ALTA SIERRA. WE ARE ALL STRONGLY OPPOSED TO THE MINE. THE "ONLY" POSITIVE I HAVE HEARD IS - MORE REVNUE AND JOBS - YET EVERY BIZ HAS A HELP WANTED SIGN. THE MINE WILL ATTRACT MORE PEOPLE TO MOVE FROM OUT-OF-TOWN! THIS FEELS LIKE A DECISION BASED ON GREED AND IGNORING THE LOTS OF ENVIRONMENTAL CONCERNS. RISE HAS A HORRIBLE RECORD AND HAS FAILED TO SHOW RESPONSIBILITY - NO MINE!
TIFFANY GRAVES - GV RESIDENT

Ind 790-1

INDIVIDUAL LETTER 790: TIFFANY GRAVES

Response to Comment Ind 790-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project and concerns regarding the applicant. Please see Master Responses 1 and 3. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration

Individual Letter 791

From: Tim Brennan
To: bdofsupervisors
Subject: Idaho-Maryland Mine
Date: Tuesday, March 22, 2022 4:41:12 PM

Dist 1

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Dear madams and sirs,

Please count me as opposed to the re-opening of the Idaho-Maryland Mine, at least as currently proposed.
I suggest that the draft environmental report falls short of accurately identifying the environmental, social, and economic impacts to the community and the mitigation measures proposed are inadequate.
I will not enumerate any specifics here now as the public discussion has been vigorous, detailed, and well published. Others have already spoken to the specific concerns. And, of course you have all been paying close attention,I am sure. Thank you for your public service; all your time, effort, and dedication for the benefit of Nevada County and its citizens.
If the volume of public comment I have seen is any indication, the population of Nevada County seems overwhelmingly opposed to approving the current proposal, even with such adjustments or conditions of approval as may be suggested.

Ind 791-1

By the way, I am a participating member of the Nevada County community; 35-year resident of District 1, property owner, small business owner, business & private tax payer. I shop locally for goods and services, and I vote every opportunity provided to me.

Thanks for listening,
Tim Brennan
530/265-8154

INDIVIDUAL LETTER 791: TIM BRENNAN

Response to Comment Ind 791-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Social and economic concerns are outside the scope of CEQA - please see Master Responses 1 and 2. Additionally, the commenter expresses a general opinion that the DEIR is inadequate, but does not provide specific examples that would allow for a detailed response. The comment has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 792

From: Tim Brown
To: Idaho MMEIR
Subject: Mine
Date: Friday, January 14, 2022 11:35:25 PM

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Ind 792-1

What is not mentioned in any report is the homes that will suffer from the opening of the mine with families on green horn road. I am such a family I have a home .5 milieus from the site, you mention Bennett st many times but no mention of the hundreds of homes on greenhorn with wells. The Eire report mentions only a portion of the property not the hole 175 acres. Also in his earlier statement rise gold mention of cancer causing politeness , but also said it is in small amounts, it is not his family that can die from partials in the air or the schools it blows towards. I am not pleased when the citizens of grass valley are placed in a position of being NOT Significant. Enough to count as the report reported , This will only cause damage and property value loss for the next 80 years if approved. Tim brown Grass valley
Sent from my iPad

INDIVIDUAL LETTER 792: TIM BROWN

Response to Comment Ind 792-1

Regarding well impact concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding cancer concerns, the DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the DEIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HRA presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR.

Individual Letter 793

From: Tim Stokes
To: Idaho MMEIR
Subject: Objections to the re-opening of the Idaho-Maryland mine
Date: Saturday, March 12, 2022 8:49:52 PM

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Section 1.4 of the Draft EIR states:
"The utility and purpose of the Centennial Clean up Project is to ensure timely and efficient clean-up... " (of the site).

After discussing court rulings in similar instances of " Separation of Utilities",
the report concludes,
"Consequently, the Idaho-Maryland Project can proceed independently from the Centennial Clean-up Project, even if the Centennial Clean-up Project is not completed within the terms of the mining permit."

Ind 793-1

The proposed permit is for eighty years.Does Nevada County consider that "timely"? And if the Clean-up Project is not completed within that time frame, and the fill is placed at the Brunswick site,then there couldn't be a "full placement"...to the pad design elevations" at the Centennial site.
Consequently, there would have to be more truck traffic generated (with the attendant environmental impacts),both onsite and offsite that the EIR doesn't address.

I am opposed to the re-opening of the Idaho-Maryland mine.

Ind 793-2

Tim Stokes
127 Northridge Dr.
Grass Valley, CA 95945

INDIVIDUAL LETTER 793: TIM STOKES

Response to Comment Ind 793-1

Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 793-2

The commenter's opposition to the proposed project is noted for the record. Please see Master Response 1.

Individual Letter 794

From: Tina Hannon
To: bdofsupervisors
Cc: County Counsel
Subject: Rise Mine public hearing - accessibility
Date: Saturday, March 19, 2022 3:27:23 PM

Dist 2

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Ind 794-1

I am writing to request that the Public Hearing this Thursday, March 24, 2002 on the Rise Gold Mine project be closed captioned in real time, inside the Board Chambers , to provide accessibility and the opportunity for full participation by the hearing impaired (the opportunity to comment during the hearing's proceedings). This accessibility service can be provided by a certified shorthand reporter with realtime capabilities. Please include this request into the Board's file on the Rise Gold Mine project. Thank you.

Tina Hannon
16105 John Way
Grass Valley, CA. 95949

INDIVIDUAL LETTER 794: TINA HANNON

Response to Comment Ind 794-1

The comment does not address the adequacy of the DEIR. However, the commenter's suggestion has been noted for the record and forwarded to County staff.

Individual Letter 795

From: Todd Wulf
To: bdofsupervisors
Subject: Reopening of the Idaho Maryland Mine
Date: Friday, February 18, 2022 9:40:00 AM

Dist 3

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2/18/2022

TO: Nevada County Board of Supervisors

FR: Todd Wulf, Grass Valley property owner, 15033 Towle Lane, Grass Valley, 95945

RE: Reopening of the Idaho Maryland Mine

Ind 795-1

As a homeowner and long-time resident I am writing today with deep concern about what I consider to be Rise Gold/Grass Valley's efforts to minimize the effects their industrial mining operation will have on the quiet rural areas around the proposed mine and dump sites. Rise Gold/Grass Valley is emphasizing that mining will be done 500-1000 feet underground and that the blasting and crushing will be "unnoticeable and undetectable."

Even if this was true, which I do not believe and which is not what the evidence points to in other "modern" mining efforts, their willingness to downplay the underground operations and overlook the above ground impacts point to the company's underlying aim to promote their agenda above honestly considering the effect the mine will have on our community.

I am not well-educated in the particulars of the modern mining industry; however, it is easy to imagine the noise and dust that will be created by mechanisms aimed at getting the rock to the surface from 500-1000 ft. below. In addition, the line of large trucks idling while waiting to have the ore loaded and the sound of all that material landing in a truck bed, over and over for 16 hours a day sounds impactful.

Ind 795-2

Then, there is the transportation of it out onto Brunswick Road with a truck every 10 minutes or so gearing up and down to get out of the compound, at Greenhorn 4 way stop and while turning onto Whispering Pines. Not to mention the trucks passing back and forth up and down Bennett Road all day.

Ind 795-3

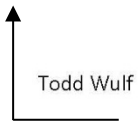
If that's not enough, the operation includes the sound of morning to night heavy equipment compacting, excavating, and grading fill piles up to 7 stories tall. That's 70 feet! That's higher than most buildings in our lovely county. Just the beep, beep, beep of the movers constantly backing up will be excruciating for miles around let alone the noise of the work being done.

Ind 795-4

The whole thing sounds like a noisy, intrusive, bad idea. It sounds incredibly impactful. I urge you not to dismiss or diminish the concerns of residents about the reopening of the Idaho Maryland Mine. We make up the county. We purchase goods and services, we participate in community life with work and volunteer activities, we pay taxes, and there are a great many of us who will be affected.

Please do not bring this disruptive proposition to our area in exchange for less than 300 new jobs and a relatively small amount of tax revenue that can likely be acquired in a way more conducive to the health and quality of life that we who live here cherish.

Respectfully,


Todd Wulf

INDIVIDUAL LETTER 795: TODD WULF

Response to Comment Ind 795-1

Air pollution and dust are addressed in Chapter 4.3 of the DEIR, and Noise is addressed in Chapter 4.10. Based on the project-specific noise analysis, which was independently reviewed by the County's third-party noise consultant, none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Response to Comment Ind 795-2

Please refer to Chapter 4.12, Transportation, of the DEIR for additional information related to truck traffic. Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Response to Comment Ind 795-3

Please see Response to Comment Ind 795-1. It is also noted that Mitigation Measures 4.10-1 and 4.10-2 prohibit use of conventional "beeper" devices on construction and haul vehicles.

Response to Comment Ind 795-4

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please refer to Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 796

From: Veronika Behlmer
To: bdofsupervisors
Subject: Don"t trust Ben Mossman or Rise Gold
Date: Wednesday, February 9, 2022 6:42:57 PM

Dist 3

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Dear Nevada County Supervisors

Re: Rise Gold behavior demonstrates they can't be trusted.

It causes me concern that Rise Gold and Mr. Mossman have shaded the truth, spun it or used selective information to attain their goals… and we are supposed to trust him? If he has shown less than honest behavior is it prudent to grant Rise an 80 year permit? Following are three examples:

Ind 796-1

1) The survey to residents in the county included the question: " If opening the mine protected you from wildfire, would you support opening the mine? What a loaded question! The mine would not have protected use from the Bennett, River or Idaho Maryland/ Brunswick fire this summer. How about asking the question would you be in favor of the mine if it decreased traffic safety from increased traffic, which it will, with our two lane roads with blind and semi blind turns; roads that would require drivers to cross traffic lanes without signal lights. There was a fatal head on accident on Brunswick last fall.

Ind 796-2

2) Looking at table 21 and 22 from the noise analysis performed by Bollard Acoustical, it said the criteria for noise will not be exceed for post construction operations. While it may be true noise may not exceed a decibel level, the background noise will increase. How can it not with 13,000 trips per month based data given on page 883 and 884 of the DEIR? No mention of this in the survey ! I can easily hear cars on Bennett with my double pane windows closed and my house is 700 feet off the road. What about the ore trucks running 14 hours per day seven days a week? Let's hope the employees of Rise do not commute on motorcycles.

Ind 796-3

3)When the DEIR came out this was a quote in the Union paper: " The results of the county's independent study and analysis of the project speak for themselves; there are no significant impacts to water quality, groundwater, air quality or the natural environment.

"Rise Grass Valley is proud of its state-of-the-art Idaho-Maryland Mine reopening project that will minimize air and greenhouse gas emissions and protect water quality while creating more than 600 good-paying jobs, increasing fire safety and boosting the Nevada County economy.

Six hundred jobs? How can that be when their documents refer to 300 jobs? Did the Union get this wrong? Even if 300 jobs, it is over stated. Are they going to hire 300 people without mine experience to operate the mine? They will have to bring in experienced people to manage and train new hires that will subtract from the jobs created for the local population. Increase fire safety? The above statements by Rise are such a distortion of the truth and conveniently omits negative aspects.

Ind 796-4

We know from Mossman's legal troubles in Canada that he should be handled with care. Observing statements and documents from Rise makes me trust them all the less. Please vote "no" on the mine. Their behavior demonstrates they can't be trusted.

Tom Behlmer
12448 Old Mine, Grass Valley
District 3

INDIVIDUAL LETTER 796: TOM BEHLMER (1)

Response to Comment Ind 796-1
The comment does not address the adequacy of the DEIR, but rather expresses general concern regarding the applicant. Please refer to Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Response to Comment Ind 796-2
Tables 21 and 22 of the Noise and Vibration Analysis prepared for the proposed project present cumulative noise exposure, which includes background noise. With the consideration of background noise, noise levels would not exceed the applicable daytime and nighttime noise criteria at the studied sensitive receptors. Please refer to Chapter 4.10, Noise and Vibration, for addition information related to noise impacts.

Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Response to Comment Ind 796-3
The comment does not address the adequacy of the DEIR, but rather expresses concerns about public statements made in regard to the proposed project. The commenter's concerns are noted for the record and have been forwarded to the decisionmakers for their consideration.

Response to Comment Ind 796-4
Please see Master Response 3 – Operator Responsibility.

Individual Letter 797

From: Tom Behlmer
To: Idaho MMEIR
Subject: Comment on mine from Grass Valley resident
Date: Monday, January 10, 2022 9:36:00 PM
Attachments: Sherry Movers"s Photos (1).jpeg

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Matt Kelley, Senior Planner
Nevada County Planning Department

Ind 797-1 The Rise Gold mine will generate an additional 16,640 one way trips per month. Yet the company filings with the county consider the traffic increase as negligible. I would not consider that increased amount negligible. The resultant emissions, noise and safety hazards are not acceptable.

Ind 797-2 Roads leading to the mine (Bennett, Brunswick and Hwy 174) are two lane twisting roads with semi blind curves with perpendicular feeder roads all along the way that require merging cars to cross oncoming traffic. Increased traffic from the mine will raise the risk of fatal accidents. In the fall of 2021 there was a fatal head on accident at the top of Brunswick that sent two others to the hospital. It occurred under ideal driving conditions. A picture is above. I have nearly had a head on accident on Bennett taking my daughter to school when a car crossed into my lane. Luckily for all, he was able to pass me on my passenger side while using the shoulder as the third lane.

Ind 797-3 If approved, I feel like the residents within a half mile of the mine will be sacrificial lambs. We will suffer increased traffic safety risks, more noise, pollution, potentially de-watered wells and ultimately devalued property.

Lastly, an evacuation due to a fire will only make a safe evacuation more difficult.

Monthly traffic calculation from pages 883 and 884 of E.I.R.:

Ind 797-4
44 x 20 days, employees working five days a week
134 x 30 days, half of the seven day off, seven day on work force
57 x 30 days, ore truck and ancillary trips with potentially twice this amount during peak periods.

6610 x 2 for the second leg going outbound =13,220 trips in or out per month. Again this could be higher during peak periods.

Tom Behlmer
12448 Old Mine Rd
Grass Valley CA 95945
(530) 272-3147

INDIVIDUAL LETTER 797: TOM BEHLMER (2)

Response to Comment Ind 797-1

The comment expresses a general opinion that the project-generated traffic should not be considered negligible, but does not provide specific examples that would allow for a detailed response. Contrary to the commenter's statements, the DEIR does not conclude that all potential environmental impacts that would occur from traffic generated by the proposed project would be less than significant, or negligible, to use the commenter's term. In fact, as summarized in Table 2-1 of the DEIR, which begins on page 2-10, the DEIR identifies significant impacts with respect to air quality, noise, and transportation and requires mitigation measures to reduce the severity level of such impacts to the extent feasible.

Please see Master Response 1.

Response to Comment Ind 797-2

Potentially hazardous road conditions associated with the proposed project are evaluated in the DEIR under Impact 4.12-6, which starts on page 4.12-83. As detailed therein, due to the nature of the project, a number of potential issues related to roadway design features and incompatible uses could occur as a result of implementation of the proposed project, including the adequacy of pavement conditions for truck traffic, routes to handle truck turning movements, sight distance along proposed haul routes, and acceleration of trucks on grade. The DEIR concludes that proposed project would result in a significant impact, as short-term construction traffic and potential street closures could interfere with existing roadway operations during the construction phase; the additional project truck traffic would result in a shorter lifespan of the pavement or increased maintenance at a number of study roadway segments; and pavement improvements would be required at the E. Bennett Road/Millsite Road intersection to ensure adequate truck turning movements. However, the DEIR requires various provisions to address such impacts through Mitigation Measures 4.12-6(a) through 4.12-6(f). Through implementation of the aforementioned mitigation, impacts would be reduced to less than significant.

Response to Comment Ind 797-3

The comment does not directly address the adequacy of the DEIR. The comment asserts that approval of the proposed project would result in impacts to residents within 0.5-mile of the project site related to traffic safety, noise, pollution, wells, and property values, but does not provide specific examples that would allow for a detailed response. Please see Master Responses 1, 2, and 15 – Adequacy of Groundwater Monitoring Wells. For traffic safety risks, please see Response to Comment Ind 797-2. For noise concerns, please see Response to Comment Ind 795-1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 797-4

Please see Master Response 5 – Evacuation Zones and Master Response 6 – Wildfire Impacts. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

From: Tom Behlmer <gogettom@hotmail.com>
Sent: Monday, January 10, 2022 9:36 PM
To: Idaho MMEIR
Subject: Comment on mine from Grass Valley resident
Attachments: Sherry Moyers's Photos (1).jpeg

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Matt Kelley, Senior Planner
Nevada County Planning Department

The Rise Gold mine will generate an additional 16,640 one way trips per month. Yet the company filings with the county consider the traffic increase as negligible. I would not consider that increased amount negligible. The resultant emissions, noise and safety hazards are not acceptable.

Roads leading to the mine (Bennett, Brunswick and Hwy 174) are two lane twisting roads with semi blind curves with perpendicular feeder roads all along the way that require merging cars to cross oncoming traffic. Increased traffic from the mine will raise the risk of fatal accidents. In the fall of 2021 there was a fatal head on accident at the top of Brunswick that sent two others to the hospital. It occurred under ideal driving conditions. A picture is above. I have nearly had a head on accident on Bennett taking my daughter to school when a car crossed into my lane. Luckily for all, he was able to pass me on my passenger side while using the shoulder as the third lane.

Ind 798-1

If approved, I feel like the residents within a half mile of the mine will be sacrificial lambs. We will suffer increased traffic safety risks, more noise, pollution, potentially de-watered wells and ultimately devalued property.

Lastly, an evacuation due to a fire will only make a safe evacuation more difficult.

Monthly traffic calculation from pages 883 and 884 of E.I.R.:

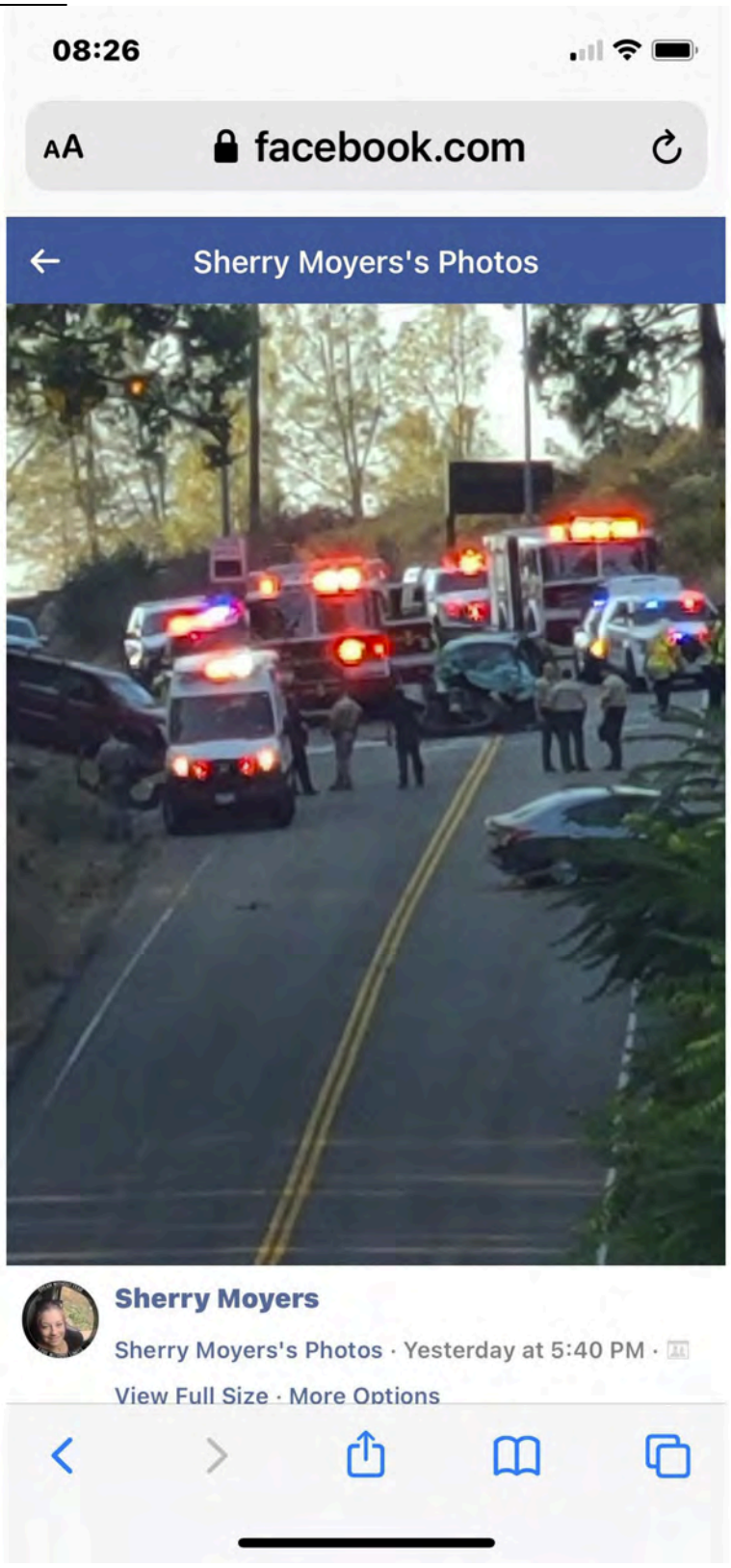
44 x 20 days, employees working five days a week
134 x 30 days, half of the seven day off, seven day on work force
57 x 30 days, ore truck and ancillary trips with potentially twice this amount during peak periods.

6610 x 2 for the second leg going outbound =13,220 trips in or out per month. Again this could be higher during peak periods.

Tom Behlmer
12448 Old Mine Rd
Grass Valley CA 95945
(530) 272-3147

1

Ind 798-2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INDIVIDUAL LETTER 798: TOM BEHLMER (3)

Response to Comment Ind 798-1

This letter is a duplicate copy of Individual Letter 797. Please see comments and responses in Individual Letter 797.

Individual Letter 799

From: Veronika Behlmer
To: Idaho MMEIR
Subject: No mitigation plan for employee commute traffic or ore trucks aside from not using brakes.
Date: Friday, January 28, 2022 12:01:32 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Matt Kelley, Senior Planner
Nevada County Planning Department

After reviewing the D.E.I.R. and the number of trips generated, I did not see mitigation measure plans about noise from the increased traffic generated by the mine. There are noise mitigation measures for the actual operation of the mine, but it appears not for traffic generated by the mine as long as it does not breach a certain decibel level. What concerns me is not the surpassing of a decibel level, but instead the increased din of traffic. The amount of one way trips generated per month will be in excess of 13,000 using information found on page 883 of the D.E.I.R.

In the traffic analysis document filed with the county, it was deemed that the increased noise would not be deemed "significant" and no mitigation was required. While true that a decibel level may not be surpassed, the background noise would be more prevalent. Would you want an additional 13,000 trips per month in your neighborhood? Would it add to the ambient noise level?

Ind 799-1

Because most of the houses around the mine sit above it, the noise will travel. I live 800 feet off and above Bennett Road and have to keep my bedroom window closed or else be woken up by morning commute traffic. I can only imagine what the noise will be like if the mine opens.

The 13,200 one way trips would equate to an average of an additional car trip of one every two minutes in the vicinity of the mine.

13,200 / 30 days = 440 per day divided by 12 hours per day = 36 per hour or a car every two minutes. Of course not all traffic will be confined to one road. Assuming it is split evenly between going west Brunswick, east on Brunswick to Hwy 174 and Bennett to Hwy 49, it would be a car or truck passing on average every five to six minutes seven days a week 12 hours per day. Plus there is the issue of added exhaust from the traffic.

Tom Behlmer
12448 Old Mine
Grass Valley CA 95945

INDIVIDUAL LETTER 799: TOM BEHLMER (4)

Response to Comment Ind 799-1

With respect to potential traffic-related noise impacts that could occur as a result of the proposed project, the DEIR evaluates such impacts under Impact 4.10-2, which starts on page 4.10-31, as well as under Impact 4.10-3, which starts on page 4.10-37. With respect to off-site traffic during the first five years of the project, when fill would be transported from the Brunswick Industrial Site to the Centennial Industrial Site, the DEIR concludes that the traffic noise level increases from the transport of fill from the Brunswick Industrial Site to the Centennial Industrial Site and employee trips would not exceed the applicable County thresholds of significance at any of the nearest residential receptors. However, because the use of jake brakes could result in a substantial increase in ambient noise levels, the DEIR includes Mitigation Measure 4.10-2, which mandates that haul truck operators operate their trucks in such a manner so as to not require the use of jake brakes along the project haul routes.

With respect to potential long-term off-site traffic noise impacts, the traffic noise level increase from the transport of fill from the Brunswick Industrial Site to the highway and from employee commutes would not exceed the applicable County thresholds of significance at any of the receptors. Therefore, noise-related impacts from off-site heavy truck and employee traffic are found to be less than significant under Impact 4.10-3. CEQA requires use of thresholds of significance when determining impact significance, as has been done in the project noise analysis.

Please see Master Response 1 and the discussions and analyses in Chapter 4.10, Noise and Vibration, of the DEIR. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 800

From: Tom Bremser <tom.bremser@gmail.com>
Sent: Tuesday, March 22, 2022 10:40 AM
To: Idaho MMEIR
Subject: Objection to the proposal to reopen the Idaho Maryland Mine

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Ind 800-1

As Nevada County residents and property owners, we strongly object to the proposal by Rise Gold to reopen the Idaho Maryland Mine.
We own property and reside on Idaho Maryland Rd, just north of the east end of the Nevada County Airport runway. Maps of the existing mine shafts indicate that historical shafts lie under my property. The driving route into downtown Grass Valley is either Brunswick to Whispering Pine or Brunswick to Bennett. With our property's proximity to the mine site and the proposed use of the Centennial site as a waste disposal site, the reopened operation will have a significant impact on our daily lives. Not only are we concerned about the lowering of the value of our property, we also are concerned about the negative effect the mine operation will have on our air quality, the effect of the required detonations, the added noise, traffic and a refuse site within the Grass Valley city limits.
This is no longer the 1850s nor even the 1950s. This proposal is 70 years past its expiration date. A residential community has grown up around the mining operation site and the land use has changed. This area should not be the location of this type of heavy industry.
The hubris of a group of outsiders, who are from outside not only our community, but our county, state and country, is beyond belief. With only the hope of their own financial reward and seeming disregard of our community, Rise Gold is offering a minimum to Nevada County in return. This idea is bad for Grass Valley and all of Nevada County, and we do not think that Nevada County should approve the proposal.

Thomas Bremser and Debra Humm-Bremser
13180 Idaho Maryland Rd
Nevada City

INDIVIDUAL LETTER 800: THOMAS BRESMER AND DEBRA HUMM-BRESMER

Response to Comment Ind 800-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Property value concerns are outside the scope of CEQA – please see Master Response 1. Regarding air quality concerns, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Climate Change. Regarding noise concerns, please see Chapter 4.10, Noise and Vibration, and Response to Comment Ind 795-1. Regarding generally noted traffic concerns, please see Chapter 4.12, Transportation.

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration.

The Customer Point of View

Re: Comments to the DEIR for the Idaho Maryland Mine

Hello,

The following areas are two areas where I believe further information must be supplied to further validate the eventual EIR to be a comprehensive document.

Ind 801-1

1. In section 4.9-5 there is a chart that is the source of assumptions in the DEIR. The chart is housing units and vacancy rates. Knowing Nevada County, and even seeing the data, it should not be presumed that the entire county is part of the sphere of housing for Applicant employees. In fact the entire Truckee data, a whopping 51% vacancy rate and over half of total vacant units is most certainly different than the far more local and applicable 8% vacancy rates seen in Grass Valley and Nevada City. Looking more closely then at the increases on traffic and other services may turn out very differently if looked at from a geographic point of view. Parsing to identify the reality of how humans are currently (in 2022, not 2018 data) dispersed would be far more informative to everyone.

Ind 801-2

2. As best as I can tell, overall identification and mitigation for Carbon Footprint/Climate Change is entirely missing from this document. Based on my reading of CEQA Guidelines (https://opr.ca.gov/ceqa/ceqa-climate-change.html) requires consideration. Since this appears to be omitted, the DEIR will need to be resubmitted to the public after revision. It is unreasonable to accept whatever data is used in a section of this nature and should be reviewed from many perspectives prior to a final consideration by the Planning Commission.

The County has undergone tremendous transformation since this mine was closed in 1956. The data I have found shows entire county population in 1950 at 19,888 and in 1960 20,911. From that, we can infer that the closure of the mine in 1956 was the beginning of the beginning of when the county population went through a boom cycle, NOT driven by mining. The population is currently 98,790 a FIVE FOLD increase after mining LEFT. During that time, the county also attracted other types of industrial and commercial businesses and industries, having come and gone, some with greater legacies than others.

Ind 801-3

Over the period from 1960 to present day, all of the real estate adjacent to the Applicant's site has been purchased on the open market, built and populated with residential housing that aligns with the above population boom. The nearest commercial uses are at the Nevada County Airport. Unfortunately, the County has not revisited the reality of those changes of the "neighborhood" around the Idaho-Maryland Mine site now encircled by homeowners.

As the mine was closing, the winds of change were already swirling. In 1955 Brunswick Road was expanded, which created the opportunity to turn the Glennbrook basin into the retail and food uses it now holds. Additionally, to put a further exclamation point on the transformation of Nevada County, the freeway between Grass Valley and Nevada City was built in the 1960s, further creating two cities with suburbs and putting added pressure on the historic mining uses. Collectively, these businesses create millions of dollars of direct revenue through taxes to Grass Valley and Nevada County, which the mine will not.

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Ind 801-4

Not considering the changing landscape of usage over these decades has created a donut for the Idaho-Maryland Mine that puts at risk the life and values that all of the new (relative to 1956) residents enjoy today, day in and day out. Hence the deep concerns over air, water, noise, traffic, etc., are a logical concern for this community.

Ind 801-5

Addressing the two topics referenced above is one of the many more scientific and data driven fragilities of this DEIR. The DEIR does not weigh the risks of the mitigations, nor the financial ability of the applicant to provide these indefinitely. One needs look no further than the Lava Cap gold mine, it's closure and eventual challenges for cleanups (albeit not part of the Applicant's process) that the owners did not have the capital reserves to administer years after closure. A 10-year-long lawsuit finally put a price on the effort, which may not necessarily be payable by the owner's own assets. What do you do when the owner simply closes the door and leaves?

The risks therefore, are important to consider in the DEIR. It may not be "required", but, it should be requested to be included wherever possible. And backups to those risks, "then what" need to be addressed in advance. A corporation's business motivation is to operate at the lowest possible costs, creating incentives to reduce costs indefinitely. That is not the general homeowners perspective on their home and therein lies an immediate and indefinite conflict. When the City or County fails to meet the needs, there is a democratic process in place as well as many, many ways to seek conflict resolution. A corporation falls outside of all of those and can move forward meeting whatever it does as the minimum cost standard that achieves the promised mitigation....as long as the money lasts.

Ind 801-6

With the plan and DEIR missing Greenhouse gas emissions conversation entirely, and using data from Truckee to guide thinking about housing in GV and NC, it does not look at the future realistically. It can anticipate trucks driven without drivers (reducing headcount). It can expect power outages (creating the need for onsite electrical power requirements), it can look at the carbon footprint (being a creator of significant carbon emissions, I suspect) and the Planning Commission and the Community can now require that these subjects be addressed for open conversation.

Ind 801-7

The Environmental Impact Statement is intended to look into the future. With an 80 year commitment and promises to all those neighbors and the entire community, it's incumbent upon the Planning Commission to hold the Applicant accountable into the future, under foreseeable future outlooks for what it presents today.

Thank you for your consideration.

Respectfully,

Tom

Tom Larsen

TomLarsen@alum.berkeley.edu
B.S. Conservation of Natural Resources, focus Environmental Impact Statements, UC Berkeley
Current resident, former and current business owner and property owner in Nevada County,

INDIVIDUAL LETTER 801: TOM LARSEN

Response to Comment Ind 801-1
Comment noted. The data presented in Table 4.9-5 of the DEIR is from the adopted Nevada County Housing Element Update. As noted on page 4.9-9, the overall housing vacancy rate in Nevada County, including incorporated areas is at 22.5 percent, which is an increase of approximately 6.6 percent over 2010 levels. Each jurisdiction in the County has seen a similar increase in the overall number of vacant units within their jurisdiction with the unincorporated area going from 12.3 percent in 2010 to 14.4 percent in 2018.

Response to Comment Ind 801-2
The commenter is incorrect. Impacts related to carbon emissions and contribution to global climate change are evaluated in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, specifically under Impacts 4.3-7 and 4.3-8.

Response to Comment Ind 801-3
The comment provides a brief history of growth in Nevada County, but does not address the adequacy of the DEIR. Potential adverse physical environmental impacts of the proposed mine on the surrounding community are addressed throughout the technical chapters of the DEIR.

Response to Comment Ind 801-4
The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not enable a more specific response. For concerns related to air, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. For concerns related to noise, please see Chapter 4.10, Noise and Vibration. For concerns related to traffic, please see Chapter 4.12, Transportation. For water concerns, please see Chapter 4.8, Hydrology and Water Quality, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 801-5
Please see Master Response 3. Additionally, pursuant to Section 15145 of the CEQA Guidelines, CEQA does not require evaluation of speculative impacts.

Response to Comment Ind 801-6
Please refer to Responses to Comments Ind 801-1 and Ind 801-2.

Response to Comment Ind 801-7
The comment does not address the adequacy of the DEIR, but rather expresses general concerns about the proposed project. The commenter's concerns are noted for the record and have been forwarded to the decisionmakers for their consideration.

Individual Letter 802

From: Tom Martin <topamar@gmail.com>
Sent: Wednesday, March 30, 2022 11:15 AM
To: Heidi Hall; Idaho MMEIR
Subject: Idaho-Maryland Mine EIR

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Ind 802-1

I have done my best to review the Environmental Impact Report for the proposed mining project. Despite having training and 35 years of experience in civil engineering and planning, and having prepared environmental documents myself, I found the report to be lacking in clear nexuses between identified impacts and proposed mitigations. This, together with the applicant's history of ignoring mitigations and remediations on previous projects, leads me to conclude that the only way to protect Nevada County and its citizens is to require an adequate Performance Bond to insure that all requirements, mitigations and remediations are actually done. Because of the broad scope of work, the range of potential impacts, the 80 year term of the permit and the unforeseen costs of future cleanup, the amount of the Performance Bond should be in the $50 million to $100 million range. An adequate Performance Bond is the only guarantee that Nevada County can be made whole again after this massive extraction process. The bond needs to be accessible to the County during the work and after the applicant has vacated the project site. In other words, if the project is granted the 80 year permit, the bond needs to be in place for 100 years.

Thank you for the opportunity to comment on the report,
Tom Martin
12666 Pasquale Rd, Nevada City, CA 95959

INDIVIDUAL LETTER 802: TOM MARTIN

Response to Comment Ind 802-1

The comment asserts that the DEIR is lacking in clear nexuses between identified impacts and proposed mitigations but does not provide any specific evidence to substantiate this claim. The project requires an approved Reclamation Plan. To ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan. (DEIR, p. 4.6-24; Appendix C.)

The commenter's suggestion has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 803

Dist 4

Ind 803-1

DO NOT
I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Tom & GLORIA MEYERS
Address PO Box 649, North San Juan ZIP 95960
Phone 530 470 0862
Email Address tomglomeyers@earthlink.net
WE OPPOSE OPENING THE MINE.

INDIVIDUAL LETTER 803: TOM AND GLORIA MEYERS

Response to Comment Ind 803-1

The commenter does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. The comment is noted for the record and has been forwarded to the decision-makers for their consideration.

Individual Letter 804

From: Tony Lauria <topotony@gmail.com>
Sent: Sunday, April 3, 2022 1:18 PM
To: Idaho MMEIR
Subject: IMM DEIR Public Comment - April 3, 2022

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Duplicate Comment Submission from alternate email address, to make sure original submission does not get forwarded to junk mail.

Idaho Maryland Mine DEIR comment - April 3rd, 2022
Submitted by:
Tony & Lauren Lauria
13784 Greenhorn Rd
Grass Valley, CA. 95945
530-913-6106

Ind 804-1 The DEIR is woefully deficient regarding the multitude of impacts that are not represented as the serious life changing threats they are. Nor are they properly deemed impacts that cannot be mitigated to less than significant to the health, welfare and well being of the thousands of residents residing within the boundaries of mine operations. Additionally, there are many impacts and considerations not mentioned at all in the DEIR. Please address the following. My obvious conclusion is to recommend No Project No Build.

WATER:
There is no mention of drought in the DEIR. We are experiencing the driest times in 1200 years, according to scientists.
This should be a priority issue. We need our ground water, and cannot afford the massive dewatering that is proposed. Prime example of the drought is how trees snapped during the December 2021 snow storm. So little moisture in the trees precipitated brittle conditions, that caused so many to snap under snow loads that should not have been too excessive for trees that have normal water content within.

Ind 804-2 Hydrological studies are proven to be inaccurate in determining how dewatering and mining operations will affect wells. There is no mention in the DEIR as to the potential impacts to all wells within the mineral rights boundaries. There is no mention of any other area of potential well impact, aside from the 30 proposed NID service water replacement properties directly next to the IMM mine site on Bennett St. This is a major flaw in the DEIR. There are over 500 wells within 1/2 mile of the site. Those and many more are at risk of draining and/or contamination damage. There is no definition mentioned in the DEIR as to the potential area of impact to wells, which should be the entire mineral rights boundaries.

Ind 804-3 For a proposed 80 year project, there is no guarantee the mining will be restricted to areas in the immediate vicinity of the IMM site, and thus no guarantee impacts will be confined to the immediate vicinity of the mine site. A comprehensive monitoring of each well, within the mineral boundary rights,

must be put in place before any permit is granted. As stated by professionals, such as Peters Well Drilling, any given well could be recharging from an underground fissure miles away. That is how gravity works. The DEIR must include the requirement that every well within the mineral rights be monitored for a minimum of 3 years to establish baselines of data. Sophisticated daily monitoring systems must be installed, and professional services hired to evaluate the data. This data must include, not only volume and flow, but quality tests for excessive minerals, chemicals and contaminates. Additionally, a well thought out plan of action must be created for reporting changes or failures of a well, when dewatering operations begin. An agency must be established as primary contact for this reporting, and immediate water replacement services engaged.

Ind 804-4 NID infrastructure must be in place before any dewatering and/or mining operations begin. For the vast majority of well owners, there is no option for NID service because it is physically not available. Many miles of pipelines must be installed and made ready for immediate service should a well be damaged or drained. This must be constructed for all wells within the mineral rights boundaries. Additionally, the NID service must be equal to the well volume currently available at each well. Not the proposed smaller 5/8" service pipe Rise is intending to install for the 30 Bennett St residents. These are the details that the DEIR fails to include. It allows Rise to avoid what is right and fair.

Ind 804-5 All associated costs for well monitoring, NID infrastructure and monthly service charges must be the responsibility of Rise Gold. This must be a permanent responsibility. Well owners are not asking for this mine and the risk to their wells. Any and all costs related to infrastructure, installation to homes, and ongoing service fees for NID water, must be paid for by Rise, and continue permanently. Those payments must not end with the sale of property, or any annexing to the city process. Again, this cannot be a gift to Rise by the residents. Our population is not asking for this mine project and does not want to support it. The DEIR must show that it is not acceptable to proceed with the risk to well damages until NID infrastructure is in place. Should wells be drained or damaged, there must be immediate replacement available and ready to turn on. A family home cannot sustain life without a clean water source. The DEIR must show this as fact.

Ind 804-6 A massive bond, in excess of many millions, must be posted by Rise Gold for contamination damage that could result in severe toxicity related heath incidents. We have seen how some residents of the Siskon mine disaster have suffered severe problems from the heavy metals which filled their domestic wells after the mining failure. This bond should be shown to cover potential damage to residential home foundations that are at risk due to vibrations of blasting below. All homes within the blast zones must be inspected prior to operations, to determine their integrity, should a problem arise. Again, all paid for by Rise Gold. A plan for claiming damage must also be in place, whereby a homeowner can contact an official and start their claim process.

Ind 804-7 Additionally, massive water use is projected for ongoing mine operations. This is unacceptable usage in a drought, and a burden on the priority residential use for our population.

Ind 804-8 Backflow of contamination into existing wells. First point to make is that any draw down by mine operations or dewatering may be significant in the current drought conditions. Losing only 10% of volume may reflect a compromise in isolation of the well. Every home water source must follow building codes to install back flow prevention valves. This is to prevent contamination from entering the water source.

Ind 804-9 These concerns are not speculative. Serious risks are present for all the wells within the mineral rights boundaries, and could extend outside of those boundaries. This must not be taken lightly. The DEIR must include these concerns and include the potential for severe impacts to all wells.

Ind 804-10 AIR:
The DEIR is extremely deficient in stating the severity of air pollution that will be generated from the mine. In the surrounding residential area, the community will be impacted by the massive reduction of air quality.

There is insufficient data within the DEIR regarding the presence of asbestos in the serpentine rock that is prevalent underground. Asbestos will be released from this rock and be dispersed into the atmosphere, along with silica dust. Both are less than a micron in size, per particle, and cannot be controlled by watering the area. This is entirely impossible to mitigate to less than significant.

Ind 804-11

Exhaust from thousands of diesel truck trips weekly, and heavy equipment operation, can only be mitigated to less than significant by substituting electric vehicles. The technology does not exist, so, we're going to call this another impact that cannot be mitigated.

TRAFFIC:

Ind 804-12

Sufficient studies have no been done to simulate the congested impact of increased traffic on Brunswick Rd. HWY 174 and Bennett St. Additionally, not mentioned in the DEIR, is the increased traffic for the comings and goings of 600 workers to the site. 100 heavy truck loads per day, plus that many, and more of workers and deliveries of supplies, etc, will create a nightmare situation for these thoroughfares that are constantly used by residential traffic, as well as all manner of other traffic for commuters, deliveries and emergency vehicles.

Ind 804-13

There is not a complete evaluation of the extreme congestion and fire danger posed by this project. Greenhorn Rd has 1 path to evacuation. 600 mine workers attempting to evacuate during a wildfire is, again, a nightmare scenario.

WILDFIRE:

The DEIR states, in absolute absurdity, they are not causing any increase of fire danger. Massive amounts of high explosives and thousands of gallons of fuel, on site is the obvious indicator that they are presenting an increased fire danger for the area, 10 fold. This must be re-evaluated to provide a realistic statement of impact, that is Not able to be mitigated to less than significant.

Ind 804-14

The Nevada County airport is the hub of firefighting. It should not be impeded by any operations that restrict the flow of pilots or supporting gear to their facility on Loma Rica.

Fire trucks and personal, during fire season, must not encounter any impeded traffic that would delay their response to an emergency. The 236 daily truck and vehicle trips, generated by the mine operations, will most definitely impede successful operations by Cal Fire and all local and state fire services. This must be called out in the DEIR.

REZONING:

Ind 804-15

The DEIR has not mentioned the impact of rezoning the area to accommodate heavy industrial mining operations surrounded by a residential area. It mentions a sparsely populated residential area, which is completely wrong. Since 1956, when the mine was last in operation, thousands of people have moved to this area. No one bought their homes here with the disclosure that future drilling and blasting could be happening underground 24/7/365. No one was told the light industrially zoned former mine site could be rezoned to accommodate the heavy industry of mining. No one dreamed that an industry of environmental destructive exploitation would be considered, worth the risk, a century later. These are impacts that cannot be mitigated to anywhere near, less-than-significant.

The DEIR must evaluate the zoning issue regarding drilling and blasting underneath residentially zoned areas beneath homes. 70 years ago, when no homes existed within the mineral rights area, this was not an issue. But now, hundreds of homes have been built, and are occupied over the mineral rights boundaries. For example, if a plan was proposed to mine gold within 10 feet of the surface at any of these residential homes, a re-zoning would be necessary to do so. There should be the same requirements for mining 75' below the home. That requirement could not be accomplished without changing these residential areas to industrial, which cannot happen. A residentially zoned area, with occupied homes cannot be rezoned to industrial. This fact alone, should be grounds for No Project No Build.

3

HIGH EXPLOSIVES:

Ind 804-16

No mention in the DEIR of the severe risk hauling such high explosives thru residential areas, including school zones, then storing such high explosives on the site. The use of high explosives is a severe impact and danger to the health and well being of the residential community, over which, these explosives will be detonated. Sinkholes, home foundation damage, internal home damage to walls and plaster, are just a few of the problems. The DEIR must show this is not an issue that can be mitigated to less than significant.

VIBRATION AND NOISE:

Ind 804-17

Completely inaccurate measurements are found in the DEIR. This area is quiet now, with noise from Brunswick only. There is no possibility this mining operation will not cause unbearable increases to everyone within miles of the site. We live 1 mile down Greenhorn Rd, and can hear the fairgrounds activity. Just think of the impact of hundreds of trucks, tractors and heavy equipment operating 24/7. Again, in a residential area, this is madness.

Ind 804-18

The vibration has not been addressed properly in the DEIR. The company creating the report for the DEIR did not come to my neighborhood and assess any conditions with regards to vibration. Drilling and blasting below my house will most definitely cause foundation problems and quality of life issues that cannot be mitigated at all. Imagine yourself and family living above such operations.

The DEIR must evaluate and examine the potential impact of mining operations vibration on businesses, out to, and beyond the mineral rights boundaries. Vibration under the dental and vision offices in Brunswick East, would impact physician's ability to perform the necessary delicate procedures involved in their medical practices. Accurate estimations and data must be reported with this concern. The same is true for Sierra Nevada Hospital.

Vibration must be considered a major impact for the new housing development on Brunswick and Idaho Maryland Rd. The same concerns for foundation integrity must be listed as a significant impact. The DEIR should reflect the potential for impact here, and with any other new building project proposed for the next 80 years.

Ind 804-19

The DEIR must require noise decibel rating testing on a massive scale. Our home is 1 mile down Greenhorn Rd. We were able to hear the construction of the ZAP Manufacturing building off Loma Rica near the airport. The sound was invasive and constant with noise of heavy machinery, including the inseccent back up beeping sounds of trucks. This is a "real life" result of noise pollution over distance. The proposed 24/7 noise from the mining operations would be far worse. The DEIR must show this is an issue that cannot be mitigated. Rise cannot stop their machinery and operations from causing unbearable noise for the residential population that exists in every direction around the site.

EXTENUATING CIRCUMSTANCES:

Ind 804-20

Wells are owned by private individuals and must be protected against damage or destruction, from above or below. Well owners have rights. It is not acceptable for a mining company to risk damage or destruction of wells, they do not own. Dewatering, drilling and blasting below residential homes has a direct impact to homeowners and their wells. The risk is not speculative. Again, the Siskon mine disaster reminds us of this. The DEIR must evaluate this impact and state the potential for an illegal damage and/or destruction of wells, due to their drilling and heavy explosives. Our wells must not be allowed to be tampered with by these proposed mining operations. This would be a breach of legal rights and lawful protection of property, if Rise is allowed to risk damage, draining or contamination to our wells. The DEIR should make this fully transparent and state there is no mitigation possible, since it is impossible to predict how the hydrology will react to these operations beneath my home.

The devaluation of property due to well loss or damage is inextricably connected to environmental loss and should be reflected as such in the DEIR. Any loss or damage to wells is an environmental impact that affects the value of property owners, and cannot be separated when considering the resulting impact.

WILDLIFE IMPACTS:

Ind 804-21

Very little has been mentioned about the impacts to wildlife. The DEIR has avoided the obvious, and that is, a major disruption to all wildlife in the area. This must be studied in depth and endangered species identified, as well as an accurate accounting of all wildlife in the area. Not just on site, but in all directions moving away from the site. Vibrations alone will cause wildlife to flee. Excessive noise will drive species away. The quiet evenings when owls communicate with each other, will be disrupted by the 24/7 noise. The increased flow in Wolf Creek will scour the banks and remove all forms of invertebrates, bacteria and all other lifeforms that thrive. That disruption will ripple out to the animals that depend on the creeks natural stability to survive. The chemical changes in the creek water will cause a massive die off, and/or the escape of wildlife to other areas. The DEIR does not even touch on this reality.
Here is proof of the thriving wildlife population in the area:
http://www.youtube.com/watch?v=1c4b9hrLI4s

NISENAN INDIGINOUS:

Ind 804-22

No mention in DEIR of the Nisenan people and their claims of sacred lands, and the environmental repercussions resulting in the potential impacts. This must be studied and analyzed, and reported in full.

ENGINEERED FILL CEMENT, BACKFILL INTO MINE SHAFTS:

Ind 804-23

There is no mention in the DEIR of the fact that heavy metals leach from concrete, and it's continuing impact for years to come, based on the massive amounts of the intended pumping of this mixture back into the tunnels. There is also no mention of the deadly hexavalent chromium that may be used in this mixture, nor any other list of additives that can be harmful to the ecosystem. Additionally, ground water will become contaminated, over time, by these chemicals and leaching. Eventually, wells will exhibit these in residential use for domestic purposes. This is not able to be mitigated to less than significant.

CONTRIBUTION TO CLIMATE CHANGE:

Ind 804-24

No mention of the overall contribution to climate change is discussed in the DEIR. At a time when our climate is rapidly changing due to increased carbon in the atmosphere, the DEIR should call out the specific impacts that will contribute immensely to the demise of the planet and our environment. The use of energy projected by this project is astounding, and goes against any county plan for controlling and reducing energy consumption.

SEISMiC FAULT:

Ind 804-25

The DEIR does not mention the fact that there is a fault running under the site. There must be studies to identify it's location and potential impact on the community if it should be affected by blasting and drilling above and below it. There are many documented incidents of failures involving high explosives used in mining on and within a seismic fault.

LAW ENFORCEMENT INCREASED NEEDS:

Ind 804-26

Many workers will come from outside our county. It is a fact that there will be a necessity for increased law enforcement to protect the population from the high number of transient workers that will be entering our community to work at the mine. This must be studies and evaluated. A budget must be considered for more law enforcement.

constant vibration from 24/7 drilling and blasting, draining and damage to wells that provide the only source of clean water to hundreds of homes. These are not speculative statements. Expert hydrologists will corroborate there is no way to guarantee dewatering will not draw from miles around, draining the cracks and fissures that feed these wells. The recent Siskon mine failure further stands as the reality of what can happen during deep bedrock mining under residential areas.

AESTHETICS:
The DEIR does not call out the fact that heavy industrial trucks, tractors and mining equipment are an eyesore and very negative with regards to the aesthetics of the project.

Ind 804-27

The DEIR must include the obtrusive visual component of 90 foot tall piles of tailings. This is of high detriment to the aesthetics of the area. Toxic tailings, piles 90 feet high are taller than many tress. This is an obvious eyesore and must be stated as such in the DEIR.

If there is a chance lives will be ruined, the environment damaged for thousands of years, no company should no be permitted to take that risk in the name of monetary profit.

COMPLIANCE MONITORING:
The DEIR does not provide a verifiable plan for monitoring the numerous mitigations and standards compliance. We cannot depend on the Rise company to self monitor. The CEO is under litigation for prior environmental damage due to toxic spills. 35 charges to be exact. There is no guarantee he will follow the rules this time, and the consequences are staggering, given the location amidst a surrounding residential area with thousands of inhabitants. The DEIR must offer a plan and independent service to conduct routine inspections for all aspects of the project.

Ind 804-28

COMPETENCY OF APPLICANT
The DEIR should review the abilities of the applicant to be competent and fully funded for the project. The environmental impact could be multiplied should the applicant fail to have the knowledge and ability to carry out the proper operations with the protection of the environment being a top priority. For example; if the applicant does not have enough actual money in the bank to carry out the project, this would lead to cutting corners and omitting crucial safeguards. Additionally, the track record of the applicant should be included in the DEIR to completely appraise their ability, based on experience and issues in the past. The CEO of Rise happens to be in ongoing litigation and under charges of failure to conduct operations according to law in Canada, at his last project. The DEIR would be completely remiss if this information is not stated clearly. The fact of his non-compliance with environmental laws, compromises the current project proposal, and should not be omitted from the DEIR, as it directly relates to how effective mitigation of environmental damage can be implemented. Here is the information about the CEO's past, his entire bond being confiscated and the company gone bankrupt:
https://s3.documentcloud.org/documents/3539874/Banks-Island-Gold-Charges-March-2017.pdf

https://iknnews.com/rise-gold-rise-v-ben-mossman-up-to-his-tricks-again/

Ind 804-29

SUPERFUND SITE:
The Idaho Maryland Mine is still considered a superfund contaminated site, and must be stated in the DEIR as such. No project should be allowed a permit before the complete clean up has been done. This also goes for the Centennial site. The Centennial site must also be included in the project as a whole, and not treated separately. This is stated clearly in CEQA.

Ind 804-30

ALTERNATIVES:
The DEIR fails to offer other alternatives, such as a project that has nothing to do with gold mining, and promotes the current economy of the area with non invasive, non-risk prone options. Given the attraction to this area by tourists, for the quality of nature and outdoor activities, a Visitor Center would be of great importance to this mine site. Additionally, walking & biking trails with RV camping and an Amphitheater. This is an example of one good option, that will build upon the clean environment we now enjoy, and a continued evolution away from the devastating and toxic heavy industry of gold mining.

Ind 804-31

INDIVIDUAL LETTER 804: TONY LAURIA

Response to Comment Ind 804-1

The commenter states that the DEIR is deficient because it allegedly misclassifies impacts that cannot be mitigated to less than significant. The specific comments are responded to below. The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 804-2

The commenter states that the DEIR does not address drought and is concerned with the impact on soils and vegetation from the dewatering of the mine. The commenter states that hydrological studies of how dewatered mines impact groundwater wells are proven to be inaccurate, but does not explain why. The commenter states that the DEIR underestimates the number of groundwater wells to be impacted by the dewatering of the mine. Lastly, the commenter states that the DEIR fails to analyze all groundwater wells within the mineral rights boundaries because dewatering could potentially impact those wells. The commenter states that the DEIR fails to define the potential area of impact to groundwater wells.

Regarding drought, the DEIR discusses drought in the context of climate change and states that climate change leads to more extreme, prolonged drought. (DEIR, pp. 4.3-15–16.) The DEIR also references several Executive Orders that address drought in the state. (DEIR, pp. 4.3-32–33.) Drought is also discussed in Chapter 4.11 (Public Services and Utilities) in the context of Nevada Irrigation District's (NID) efforts to address water shortages. In regard to drought related to groundwater impacts of the project, the commenter is referred Master Response 16 – Drought and Climate Change.

As to the impacts to soil and vegetation from the dewatering of the mine, the DEIR states that it can be reasonably concluded that the dewatering of the mine would not affect the available moisture for vegetation in the project area because the depth to groundwater is already below the typical rooting depths in higher topographic areas, while adequate flows would occur in South Fork Wolf Creek and Wolf Creek to maintain groundwater levels in the lower topographic areas. (DEIR, p. 4.13-21.) The commenter is also referred to Master Response 22 - Groundwater Dependent Vegetation.

Regarding the assertion that the DEIR underestimates the number of impacted groundwater wells, the commenter is referred to DEIR Chapter 4.8 (Hydrology and Water Quality) and Master Response 14 – Adequacy of Groundwater Model. The dewatering of the mine is also unlikely to impact additional wells beyond the 30 wells in the East Bennett Area because the drawdown of groundwater would largely be limited to the East Bennett Area based on the proximity of the mine workings to the surface. (DEIR, p. 4.8-54.) The commenter also asserts that the groundwater analysis should have contemplated mining within the entire 2,585-acre mineral rights area and that insufficient data was used in the groundwater model. There are not valuable gold deposits within the entire 2,585-acre mineral rights area; thus, presuming that mining would occur in the entire mineral rights area would not be accurate. Moreover, the applicant has specific areas that will be targeted for gold extraction, and the groundwater model is based on that plan, along with reasonable assumptions about potential extension of mining into other areas. The groundwater model did look at potential drawdown within the entire mineral rights area, but only a small number of wells were shown to have a significant impact, prior to mitigation. The commenter is referred to Master Response 7 - Location of Future Mining Areas. Notwithstanding the above, as noted in Master Response 7, to address public concerns regarding the scope of future mining within the

mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps A101, A201 and A202).

The commenter states that there is no definition mentioned in the DEIR as to the potential area of impact to wells and believes the area of impact should be the entire mineral rights boundary. However, Chapter 4.8 the DEIR clearly provides a definition of the threshold of significance for water drawdown induced by the mine dewatering and displays the area of simulated drawdown in Figure 4.8-11 and in Appendix K.2 (Groundwater Hydrology and Water Quality Analysis) and K.3 (Groundwater Model Report) of the DEIR. The simulated drawdown is based on the modeled geology and location of the underground mine workings, amongst other factors. Please also see Master Response 7.

Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 804-3

The commenter states that there is no guarantee that mining will be restricted to the areas in the vicinity of the Idaho-Maryland Mine site (the existing mine workings) and thus no guarantee that impacts will be confined to the immediate vicinity of the mine site. However, it is unrealistic to assume that economic gold mineralization exists everywhere within the mineral rights at 500 feet below surface. The commenter is referred to Master Response 7 – Location of Future Mining Areas. Groundwater monitoring wells are proposed and required over a large spatial area inside and outside of the mineral rights area and Mitigation Measure 4.8-2(a) requires a rigorous groundwater monitoring plan (GMP). As also noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

The commenter states that sophisticated daily monitoring systems must be installed, and professional services hired to evaluate the data and that the data must include volume, flow, and water quality. Sophisticated groundwater monitoring systems which collect data at once every 1 to 4 hours are already proposed for the project. Qualified hydrogeologists would evaluate the data from groundwater monitoring. Water quality baseline data is already proposed to be collected. Volume and flow (well yield) information is not required to be collected in the groundwater monitoring program but may be collected, if necessary, as part of the Well Mitigation Plan. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The commenter states that a well thought out plan of action must be created for reporting changes or failures of a well when mine dewatering begins. An agency must be established as primary contact for this reporting, and immediate water replacement services engaged. A “plan of action”, including well monitoring and well mitigation plans, are already required for the project. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells. As stated in Mitigation Measures 4.8-2(a) and 4.8-2(b), the Nevada County Environmental Health Department is the agency responsible for oversight of well monitoring and well mitigation.

Response to Comment Ind 804-4

The commenter states that NID infrastructure must be in place before any dewatering or mining operations begin because the infrastructure (pipelines) is not currently available to many well owners and such infrastructure must be ready for immediate service to all wells within the mineral rights boundary. As stated in Mitigation Measure 4.8-2(c), the East Bennett Area must be connected to the NID system prior to dewatering. Impacts to other areas are not projected and therefore the connection of all properties within the mineral rights is not justified nor required. However, mitigation measures are included in the DEIR to ensure that monitoring provides sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The commenter states that the performance standard for well mitigation should be equal to the well volume (yield) currently available at each well and that the 5/8-inch service connection proposed in the Well Mitigation Plan for the East Bennett Area is not sufficient**.** The Well Mitigation Plan has been edited to clarify the performance standards required for Well Mitigation (see Appendix D to this Final EIR for an updated Well Mitigation Plan). Performance standards are based on actual use of water for similar property types and not the maximum potential of domestic water wells. A 5/8" service connection is used by 75% of NID treated water accounts and is adequate for the single-family homes located on E. Bennett Road.[3]

Response to Comment Ind 804-5

The commenter states that all costs for well monitoring, NID infrastructure, and monthly service charges must be the permanent responsibility of the applicant. These costs are the responsibility of the applicant where well mitigation is required. The applicant is not responsible for reimbursement of water charges for any party that purchases one of the 30 East Bennett Area properties after the installation of the NID connection because that party would purchase with knowledge of NID service. Please refer to Mitigation Measure 4.8-2(c), which requires the applicant to fully fund the connecting of 30 properties in the East Bennett Area to the NID potable water system. The commenter is also referred to Appendix K.9 (Idaho-Maryland Well Mitigation Plan) of the DEIR.

The commenter states that water charges must be a permanent responsibility and not end with the sale of a property or annexation into the City of Grass Valley. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The commenter states that NID infrastructure must be in place because there must be an immediate replacement available and ready to turn on should a domestic water well be drained or damaged. As stated in Mitigation Measure 4.8-2(c), the East Bennett Area must be connected to the NID system prior to dewatering. Impacts to other areas is not projected and therefore the connection of all properties within the mineral rights is not justified nor required. However, mitigation measures are required in the DEIR to ensure that monitoring provides sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells.

[3] See Table 1 of NID Capacity Charge Update 2014
https://www.nidwater.com/files/0795f5c27/NIDCapacityChargeUpdate-2-12-14.pdf

Response to Comment Ind 804-6

The commenter states that the applicant must post a massive bond of many millions for possible contamination of domestic water wells. The mining activities will lead to the partial drawdown of groundwater, rather than direct recharge to the domestic wells; thus, the mining activities at the project site should not affect the water quality of the domestic wells. (DEIR, Appx. K.8, p. 14.). The commenter is also referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells, which describes the proposed domestic well monitoring plan, inclusive of water level and water quality monitoring. Therefore, a bond for contamination of domestic water wells is not required nor appropriate for the project.

The commenter states the applicant must post a massive bond of many millions for possible and damage to residential foundations from underground blasting, that all homes within the "blast zones" must be inspected prior to operations, and a plan for claiming damages must be in place. As stated on page 4.10-54 of the DEIR, ground borne vibrations calculated for blasting of both drift round and long-hole stopes, respectively, fall below the U.S. Bureau of Mines' (USBM) recommendations and the levels at which structural damage to buildings is possible. Mitigation Measure 4.10-4 requires a Ground Vibration Monitoring Program which will ensure that vibrations are never high enough to damage buildings. Therefore, a bond for damage to structures from underground blasting, pre-inspection of homes and a plan for claiming damages, is not required or appropriate for the project.

Response to Comment Ind 804-7

The commenter states that the level of water use required for the project is unacceptable during a drought. As required by state law, a Water Supply Assessment was prepared for this project which found that NID's existing and additional planned future water supplies are sufficient to meet the NID's existing water demands, including those future water demands associated with the project. (DEIR, Appx. N, p. 2.) The project's water usage will be subject to any applicable water demand cutbacks during droughts, similar to other NID potable water customers who are served by NID. (DEIR, p. 4.11-42.) The commenter is referred to Master Response 16 – Drought and Climate Change.

Response to Comment Ind 804-8

The commenter states that the dewatering of the mine will create a backflow of contamination into existing wells. The commenter suggests a threshold of significance of zero drawdown due to current drought conditions. The selection of the 10% reduction as a threshold of significant is discussed in Section 3.2.1, page 80, of Appendix K.2 of the DEIR. Simulations using the Theis equation (Domenico and Schwartz, 1990) indicate that reductions in the water column of 20 percent to 40 percent could cause the production rate of the well to become unstable by incrementally decreasing the water column much more than would occur under existing conditions. For this analysis, a 100 percent factor of safety is applied to the potential reduction resulting in unstable conditions, such that a criterion of 10 percent of the water column is used to define wells that might be substantially affected by dewatering of the underground mine workings. The commenter is also referred to Master Response 16 – Drought and Climate Change.

The mining activities will lead to the partial drawdown of groundwater, rather than direct recharge to the domestic wells; thus, the mining activities at the project site should not affect the water quality of the domestic wells. (DEIR, Appx. K.8, p. 14.) Therefore, a backflow of contamination into domestic water wells from mining activities would not occur. The commenter is also referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells, which describes the proposed domestic well monitoring plan, inclusive of water level and water quality monitoring.

Response to Comment Ind 804-9

This comment is general in nature and states that the concerns voiced in the letter are not speculative. Responses to specific comments are provided in the responses above. The DEIR has extensively analyzed impacts to domestic water wells from mine dewatering and found the impact to be less than significant after mitigation measures. (see Mitigation Measure 4.8-2.)

Response to Comment Ind 804-10

The commenter states that the DEIR's analysis of air quality impacts is deficient because there is insufficient data regarding the presence of asbestos in serpentine rock underground. The commenter states that asbestos and crystalline silica will be released into the atmosphere, which cannot be mitigated to less than significant. The commenter does not state how the data provided in the DEIR is insufficient.

With regard to air quality, the Health Risk Assessment prepared for the DEIR found that the project would not result in exposure of sensitive receptors to substantial concentrations of toxic air contaminants with the implementation of the required Mitigation Measure 4.3-1(b). (DEIR, p. 4.3-79.) Regarding the commenter's assertion of insufficient data regarding the presence of asbestos in serpentinite rock, the Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan details the methods and data collected. The Project Applicant completed 19 exploration drill holes, totaling 67,500 feet of drilling. Forty-two samples from the Idaho-Maryland Mine were submitted for asbestos testing in 2019. Forty samples were evaluated for asbestos using both Polarized Light Microscopy (PLM) and Transmission Electron Microscopy (TEM). Significant concentrations of asbestos were not detected. (DEIR, Appx. E-2, p. 7.) The commenter is also referred to Master Response 23 – Adequacy of Asbestos Sampling. Regarding the release of asbestos and crystalline silica into the atmosphere, the commenter is referred to Master Response 23 – Adequacy of Asbestos Sampling, and Master Response 21 – Conservatism of Silica Assumptions.

Response to Comment Ind 804-11

The commenter states that exhaust from diesel trucks and heavy equipment operation can only be mitigated by electric vehicles and equipment. The commenter states that because this technology does not exist, it is impossible to mitigate this impact to less than significant. The DEIR found that with the project design measures (i.e., APM-AQ-1 (Exhaust Emission Controls) and APM-AQ-2 (Surface Fugitive Dust Controls)), and Mitigation Measures 4.3-1(a) and 4.3-1(b), emissions impacts would be less than significant. (DEIR, 4.3-73.) Moreover, CEQA requires lead agencies to impose *feasible* mitigation measures. (CEQA Guidelines §§ 15041(a); 15126.4(a).) The term "feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period time, taking into account economic, environmental, legal, social, and technological factors." (Pub. Res. Code, § 21061.1.) Mitigation measures that are technologically infeasible are not legally required to be considered in the DEIR.

Response to Comment Ind 804-12

The commenter states that the DEIR inadequately describes traffic-related impacts to Brunswick Road, State Route 174, and Bennett Street, but does not how the DEIR is deficient. The commenter also states the DEIR omits any reference traffic generated by 600 employees working at the site.

The DEIR analyzes project trip generation in Chapter 4.12, including trips generated by employees and trucks at the project. (DEIR, p. 4.12-31–34.) The DEIR found that, for all segments along Brunswick Road, E. Bennett Road, and State Route 174, the project's traffic-related impacts would be less than significant. (DEIR, p. 4.12-67.) The DEIR did find that the Brunswick

Road/State Route 174 intersection would be significant and unavoidable. (DEIR, p. 4.12-56.)[4] Regarding the 600 employees, the project's total workforce is estimated to reach 312 employees. (DEIR, p. 4.9-25.) Because a large majority of the workforce would operate in 12-hour shifts, with seven days on and seven days off, only 111 employees would be present at the project at any one time. (DEIR, Table 4.9-6.)

Response to Comment Ind 804-13

The commenter states that the DEIR fails to evaluate impacts associated with evacuation from wildfire, specifically Greenhorn Road. The DEIR found that the project's impacts to emergency response plan or emergency evacuation plan would be less than significant. (DEIR, p. 4.7-36.) The DEIR also explains that in the event that residents of Greenhorn Road would need to be evacuated, the County would instruct the Idaho-Maryland Mine to cease all operations, including trucking operations. (DEIR, p. 4.7-38.) Residents of Greenhorn Road would utilize Brunswick Road to evacuate to the primary evacuation route of State Route 49/20. The commenter is also referred to Master Response 5 – Evacuation Zones.

In addition, as stated above regarding the 600 employees, the project's total workforce is estimated to reach 312 employees. (DEIR, p. 4.9-25.) Because a large majority of the workforce would operate in 12-hour shifts, with seven days on and seven days off, only 111 employees would be present at the project at any one time. (DEIR, Table 4.9-6.)

Response to Comment Ind 804-14

The commenter states that the DEIR inadequately describes the wildfire risk of storing fuel and explosives on site. The commenter also states traffic generated by the project could interfere with any firefighting response during a wildfire. The DEIR found that the project's impacts associated with the transport, use, and disposal of hazardous materials would be less than significant. (DEIR, p. 4.7-22.) As the DEIR notes, the use and transport of explosives for mining operations is tightly regulated and has a reputable safety record, with only a handful of incidents in the past 30 years. (DEIR, pp. 4.7-23–28.) Moreover, the storage of diesel fuel and other hazardous chemicals at the project site would require a number of permits and regulatory approvals, including registration with the local Certified Unified Program Agency (CUPA), in this case the Nevada County Environmental Health Department (NCEHD). (DEIR, p. 4.7-30.) Compliance with applicable federal, state, and local regulations would minimize the project's potential to pose a significant hazard to the public or the environment. (*Ibid*.) Regarding the potential for traffic to impact firefighting operations, the commenter is referred to Master Response 5 – Evacuation Zones, and Master Response 6 – Wildfire Impacts.

Response to Comment Ind 804-15

As stated on page 3-46 of the DEIR, the application to rezone the parcels located at the Brunswick Industrial Site from M1-SP to Light Industrial with Mineral Extraction Combining District (M1-ME) is to allow for surface mining facilities related to the underground mining operations, pursuant to

[4] While the impact was determined to be significant and unavoidable, Mitigation Measure 4.12-1(b) of the DEIR requires the applicant to enter into a Traffic Mitigation Agreement with the County regarding the SR 174/Brunswick Road intersection. The Agreement shall require the applicant to pay the project's fair share contribution toward the improvements necessary to improve intersection operations to an acceptable level. The Agreement shall include the fair share calculations and total payment amount. Based on the Caltrans methodology to assess fair share, it is estimated that the fair share percentage is 14.9%. While the project is contributing toward addressing its contribution of traffic to the SR 174/Brunswick Road intersection, the remaining funding needed to improve the intersection (e.g., signalization) is not yet certain, nor secured. As a result, the DEIR conservatively concludes that the impact would remain significant and unavoidable.

the Nevada County LUDC, Section L-II 2.7.3. The property would remain zoned M1 (light industrial) and would not be zoned as M2 (Heavy Industrial).

Land use and zoning issues are discussed and analyzed in Chapter 4.9 of the DEIR. As stated on page 4.9-16, subsurface mining is allowed in all base districts subject to the approval of a Use Permit. Therefore, rezoning to industrial is not required for subsurface mining.

Response to Comment Ind 804-16

The commenter states that the DEIR does not mention the risk of transporting explosives to the project site. The commenter also states that the use of explosives in the Idaho-Maryland Mine underground workings will cause disturbances to the surface and damage residences. The commenter is referred to Response to Comment Ind 804-14 regarding the safety record of the use and transportation of explosives. Chapter 4.7 of the DEIR provides discussion and analysis of explosives transport, storage, and use, which are found to have a less than significant impact after mitigation. Chapter 4.10 of the DEIR provides discussion and analysis of blasting vibration and the effect on structures. As stated on page 4.10-54 of the DEIR, groundborne vibrations calculated for blasting of both drift round and long-hole stopes, respectively, fall below the United States Bureau of Mines (USBM) recommendations and the levels at which structural damage to buildings is possible. Mitigation Measure 4.10-4 requires a Ground Vibration Monitoring Program out of an abundance of caution, which will ensure that vibrations are not high enough to damage buildings.

Response to Comment Ind 804-17

The commenter states that inaccurate measurements are found in the DEIR but does not provide specifics as to which measurements are inaccurate. Chapter 4.10 of the DEIR provides discussion and analysis of noise impacts from the project.

Response to Comment Ind 804-18

The commenter states that vibration has not been addressed properly in the DEIR. However, Chapter 4.10 of the DEIR provides discussion and analysis of vibration and is found to have a less than significant impact after mitigation. The impact to new residential housing at Brunswick and Idaho-Maryland Roads would also be less than significant after mitigation. As stated on page 4.10-58 of the DEIR, the Sierra Nevada Memorial Hospital and Downtown Grass Valley would not experience any ground vibration associated with the proposed project. Dental and vision offices in Brunswick East were not specifically evaluated. However, other structures/businesses in the surrounding area were analyzed to determine potential risk. Analog Devices may experience ground vibrations up to a maximum of 0.07 in/s PPV, which is below the limit that humans can feel.

Chapter 4.10 of the DEIR provides discussion and analysis of blasting vibration and the effect on structures. As stated on page 4.10-54 of the DEIR, groundborne vibrations calculated for blasting of both drift round and long-hole stopes, respectively, fall below the USBM recommendations and the levels at which structural damage to buildings is possible. Mitigation Measure 4.10-4 conservatively requires a Ground Vibration Monitoring Program that will ensure vibrations are not high enough to damage buildings.

Response to Comment Ind 804-19

Mitigation Measure 4.10-3 of the DEIR requires a comprehensive noise monitoring program and requires all on-site mobile equipment to be fitted with broad-band “growler” type back-up warning devices rather than conventional “beeper “devices.

Response to Comment Ind 804-20

The commenter states that the DEIR must fully disclose the potential impacts of dewatering the Idaho-Maryland Mine to private groundwater wells. The commenter also states that the potential devaluation of property from impacts to groundwater wells must be analyzed in the DEIR. The DEIR evaluated the impact of mine dewatering on domestic groundwater wells and the impact is found to be less than significant after mitigation. The commenter is referred to Chapter 4.8 of the DEIR. The commenter is also referred to Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Regarding the potential devaluation of property values, economic impacts are not a CEQA issue and are not analyzed in the DEIR. The commenter is referred to Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 804-21

The commenter states very little has been mentioned about impacts to wildlife (including noise impacts of wildlife) and endangered species in the DEIR. The commenter also states that the discharge to South Fork Wolf Creek will adversely impact riparian habitat. However, Chapter 4.4 of the DEIR provides discussion and analysis of these issues and the impacts are found to have a less than significant impact after mitigation. (DEIR, p. 4.4-68, 80.) The project will not result in any water discharge to Wolf Creek. Increased flow in South Fork Wolf Creek will not scour the banks and remove all forms of invertebrates, bacteria, and other lifeforms. The commenter is referred to Master Response 36 - Flows in South Fork Wolf Creek. Chemical changes in creek water will not impact aquatic life or other animals. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek. As stated in Appendix M (Blasting Report), the anticipated impact from drilling and blasting surrounding the proposed Idaho-Maryland Mine is negligible, and in almost all situations will be unnoticeable and undetectable. Blasting would take place twice daily between shift changes at 7AM and 7PM. Therefore, there would be no impact to wildlife from blasting vibrations.

Response to Comment Ind 804-22

The commenter states there is no mention of the Nisenan Tribe in the DEIR. However, the Nevada City Rancheria Nisenan Tribe is discussed in Chapter 4.5 of the DEIR and cultural and tribal resources were analyzed in Chapter 4.5 of the DEIR.

Response to Comment Ind 804-23

The commenter states that the DEIR fails to mention that heavy metals leach from concrete or that hexavalent chromium will be used in the Cement Past Backfill (CPB). The commenter also states that CPB will contaminate the private wells via groundwater. Chapter 4.8 of the DEIR provides discussion and analysis of water quality, including hexavalent chromium, in relation to CPB and is found to have a less than significant impact after mitigation. Regarding the assertion that the CPB will impact private wells, any water that contacts the CPB would be present only within the mine workings and would be pumped out of the mine workings by the dewatering system. As a result, that water would not have the potential to flow into the fractured bedrock and flow toward any domestic supply wells. The dewatering causes a low pressure area around the underground workings such that groundwater inflow is toward the mine, not from the mine toward the domestic wells. (DEIR, p. 4.8-48.)

Once mining is completed, dewatering ceases, and the underground workings are allowed to flood with groundwater and are anticipated to refill over several years. No further impacts to water levels in domestic wells could occur during this period. As discussed on page 119 of Appendix K.2, after mining ceases, conditions would return to those that currently exist. The proposed new

mining activities would all occur at depths that are comparable to or much deeper than the historic mine workings. (DEIR, p. 4.8-49.) Due to the substantial reduction in hydraulic conductivity at those depths, compared to the depths of the domestic supply wells, it is highly unlikely that the proposed project would affect water quality in those wells. (*Ibid*.) The arbitrary selection of 5 years of monitoring after mine closure and reflooding is not supported by the analysis. However, there will be water quality specific financial assurances for closure and post-closure maintenance of mining units as required by Title 27 section 22510. (DEIR, p. 4.8-30.) This may include the need for post closure water monitoring. This issue will be addressed in the approval of the WDR required by Mitigation Measures 4.8-1(d) and 4.8-1(e)).

Response to Comment Ind 804-24

The commenter states that the DEIR does not address how the project might contribute to climate change. Chapter 4.3 of the DEIR provides a discussion and analysis of the project's contribution to climate change and is found to have a less than significant impact after mitigation.

The commenter is also referred to Master Response 25 – Nevada County Energy Action Plan. As stated on page 4.3-89 of the DEIR, the Energy Action Plan (EAP) is not a Qualified GHG Emissions Reduction Plan under CEQA pursuant to the requirements outlined in the CEQA Guidelines, Section 15183.5(D); therefore, no CEQA document can tier from the County EAP. Nevertheless, the project's compliance with EAP strategies has been analyzed and the project was found to be consistent with the EAP. (DEIR p. 4.3-90.)

Response to Comment Ind 804-25

The commenter states the DEIR fails to discuss a fault running under the project site and must be analyzed in connection with blasting. The DEIR concluded that there is likely a fault located on or near the site, within 600 feet of the New Brunswick shaft. (DEIR, p. 4.6-31.) As discussed in Section 4.5-1 of the DEIR, based upon substantial evidence in the record, the project includes a request to amend the Final Map for Bet Acres recorded in February 1987 in Book 7 of Subdivision Maps at Page 75 to remove the "200' Building Setback From Fault", as shown on Sheet 4 of Final Map #85-7. (DEIR, p. 4.6-31–32.) In addition, a management plan was prepared pursuant to Nevada County LUDC Section L-II 4.3.8 to address potential seismic hazards associated with the previously-identified inferred fault alignment. (*Ibid.*) It is NV5's professional opinion that the subject fault, identified on the property in Map 85-7, does not qualify as a seismically active area as defined by Nevada County LUDC Section L-II 4.3.8.B, and the proposed project development within the designated building setback fault zone is generally feasible from a geotechnical engineering standpoint. (*Id*. at 4.6-32.) While the analysis shows that an active fault likely does not exist, out of an abundance of caution, the County has concluded that a significant impact could occur without mitigation. Mitigation Measure 4.6-1 requires that prior to approval of Improvement Plans, the design recommendations from the Brunswick Industrial Site Geotechnical Report (November 18, 2019) shall be incorporated into the Plans to the satisfaction of the Nevada County Building Department.

The commenter states there are many documented incidents of failures involving high explosives on and within a seismic fault but does not provide this evidence. The magnitude of the energy released during mining excavations by rock removal and rock placement is much smaller than the magnitude of energy activation required to trigger the release of a local pre-Holocene fault. No analysis was performed nor is necessary, as there is no potential for inducement of seismic activity on these faults from the proposed mining activity. The commenter is referred to the NV5 Memo attached to the Final EIR as Appendix P.

Response to Comment Ind 804-26

The commenter states the project will bring numerous workers employees from outside Nevada County and increased law enforcement will be necessary to protect the population from "transient workers." Chapter 4.11 of the DEIR provides a discussion and analysis of the project's impact on public services. As stated on page 4.11-27, the Nevada County Sheriff's Office services would not be adversely affected by the proposed project, and the headquarters would not require an expansion to enable the Nevada County Sheriff's Office to adequately serve the proposed project in addition to current demands. Moreover, the commenter's suggestion that "transient workers" would engage in criminal acts is mere speculation. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

The commenter also states that the project will adversely impact private wells in the area, but does not provide specific reasons. The DEIR evaluated the impact of mine dewatering on domestic water wells and the impact is found to be less than significant after mitigation. Please see Chapter 4.8 of the DEIR. Chapter 4.10 of the DEIR provides discussion and analysis of noise and is found to have a less than significant impact after mitigation.

Response to Comment Ind 804-27

The commenter states that trucks and industrial equipment associated with the project will create adverse aesthetic impacts. Visual simulations and analysis of the aesthetics impacts of the engineered fill piles have been analyzed in Chapter 4.1 of the DEIR. The DEIR determined that the project has a significant and unavoidable aesthetics impact, in part due to the engineered fill piles. The inclusion of industrial vehicles and mining equipment in the aesthetics analysis would not change the significance finding.

Response to Comment Ind 804-28

The commenter states that the DEIR does not provide for monitoring the various mitigations and regulatory standards. The commenter also states the Project Applicant will not self-monitor based on experience with the Project Applicant's prior projects. The mitigations measures for the project, as proposed in the DEIR, will form the basis of the Mitigation Monitoring and Reporting Program (see Chapter 4 of this Final EIR). (DEIR, p. 2-4.) Regarding the comment on the Project Applicant, the commenter is referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 804-29

The commenter states that the DEIR should analyze the financial status of the Project Applicant with regards to the ability to carry out the project. The commenter also references the Project Applicant's prior mining work in Canada, but does not comment on the adequacy of the DEIR. CEQA does not require an examination of the Project Applicant's financial status and that information is not required to be in the DEIR. A lead agency addresses financial concerns elsewhere during the approval process, such as financial assurances in a Conditional Use Permit or Reclamation Plan. Regarding the comments on the Project Applicant, the commenter is referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 804-30

The commenter states that the Idaho-Maryland Mine is a superfund site and states that the Centennial Industrial Site cleanup action must be included in the DEIR. The Idaho-Maryland Mine is not a superfund site. The commenter is referred to Master Response 9 - Historical Mine Waste at Centennial Site. The Centennial site cleanup project is a separate project. Regarding the assertion that the Idaho-Maryland Mine and the Centennial Industrial Site cleanup must be one

project, the commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 804-31

The commenter states that the DEIR should include analysis of alternative projects that have no relation to gold mining, such as a visitor center or amphitheater. CEQA alternatives are optional ways that the project could achieve most of the project's basic objectives, while also reducing or eliminating environmental impacts. (Pub. Res. Code, § 21002.) The suggested alternatives would not meet most of the basic objectives of the project. The DEIR must evaluate a range of reasonable alternatives. (CEQA Guideline § 15126.6(a).) What constitutes a reasonable range of alternatives will vary with the facts of each project and should be guided only by the purpose of offering substantial environmental advantages over the project proposal which may be feasibly accomplished in a successful manner considering the economic, environmental, social and technological factors involved. (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 5 Cal. 3d 553, 566.) The DEIR need not consider every conceivable alternative to a project. (CEQA Guidelines § 15126.6(a).)

Individual Letter 805

From: Tulum Dothee
To: bdofsupervisors
Cc: Sue Hoek
Subject: Idaho-Maryland Mine: NO!
Date: Wednesday, March 23, 2022 6:28:36 PM

Dist 4

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Ind 805-1

I vehemently OPPOSE the reopening of the Idaho-Maryland Mine.

My family & I moved to Nevada County 20+ years ago to enjoy a cleaner, quieter life. We own a home, business, work, eat, shop, and recreate here.

The Mine is detrimental to our quality of life and will cause many of your constituents to leave the County.

Thank you for your time.

Tulum Dothee, Rough & Ready

Tulum Dothee
Oakhaven Montessori School 13345 Rough and Ready Highway
Rough and Ready CA 95975
530 271-1258
http://www.oakhavenmontessori.com

INDIVIDUAL LETTER 805: TULUM DOTHEE

Response to Comment Ind 805-1

The comment does not address the adequacy of the DEIR, but rather expresses quality of life concerns, which are outside the scope of CEQA. Please see Master Response 1.

Individual Letter 806

From: Turiya Hill <turiya@jps.net>
Sent: Saturday, March 26, 2022 4:35 PM
To: Idaho MMEIR
Subject: NOOOOO to the RiseGrass Valley Mine

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ATTENTION: Matt Kelly, Senior Planner

Ind 806-1

Dear Mr. Kelly

I and thousands of Nevada County residents vehemently oppose the presence of this mine. It will degrade our county in countless ways.

All the valid reasons are out there. Please listen.

Turiya Hill
www.clearstreamacupuncture.
572 Searls Ave.
Nevada City

1

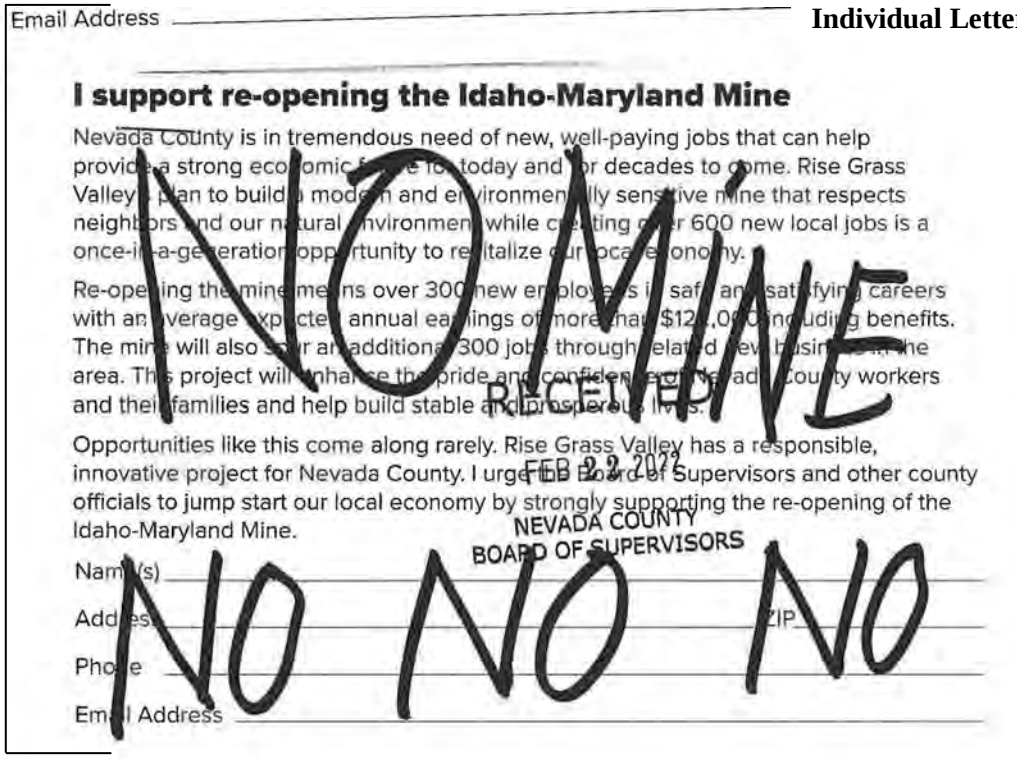
INDIVIDUAL LETTER 806: TURIYA HILL

Response to Comment Ind 806-1

The comment does not address the adequacy of the DEIR, but rather expresses concerns regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 807

Ind
807-1



Email Address _____

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $120,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

NO MINE

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

NO NO NO

INDIVIDUAL LETTER 807: UNKNOWN (1)

Response to Comment Ind 807-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 808

I support re-opening the Idaho-Maryland M.....

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind 808-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) NO MINE

Address ZIP

Phone

Email Address

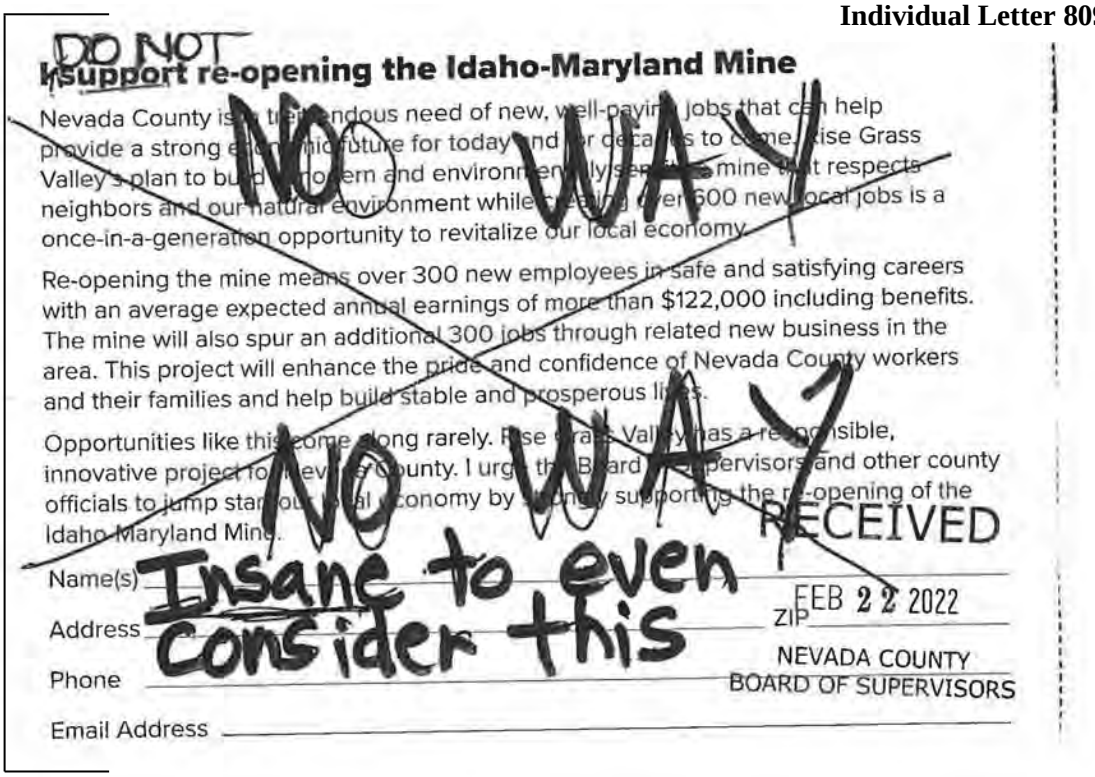
INDIVIDUAL LETTER 808: UNKNOWN (2)

Response to Comment Ind 808-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 809

Ind 809-1



DO NOT
I support re-opening the Idaho-Maryland Mine

NO WAY

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally superior mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

NO WAY

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Insane to even consider this

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s)
Address
ZIP
Phone
Email Address

INDIVIDUAL LETTER 809: UNKNOWN (3)

Response to Comment Ind 809-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 810

Ind 810-1

no name provided

DONOT SUPPORT THE

I [redacted] re-opening the Idaho-Maryland Mine

HA HA HA

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

THEY'll Bring outsourced Workers & Pollution TO OUR WATER!

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Resident

Address Grass Valley CA ZIP

Phone

Email Address

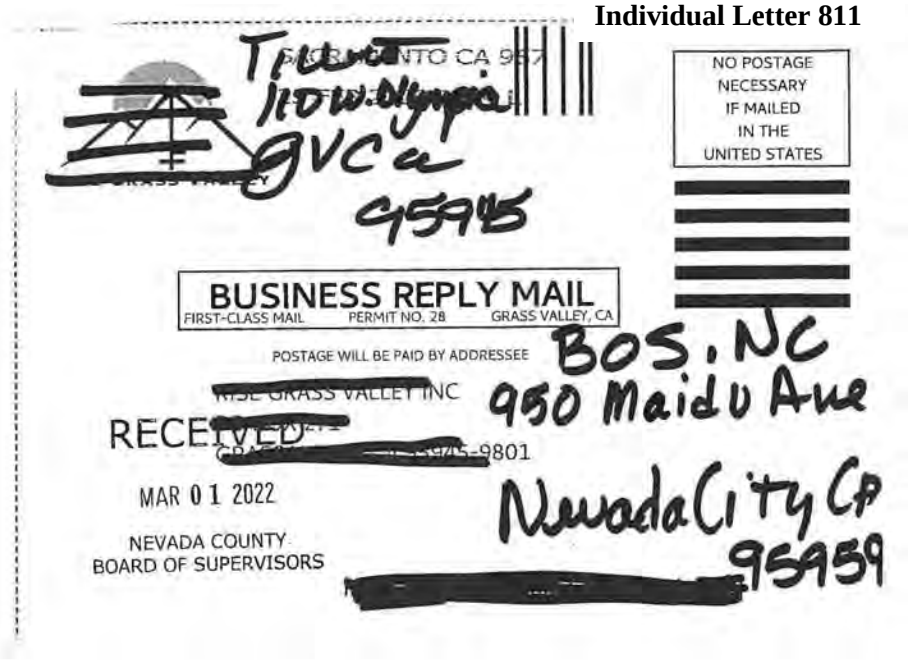
INDIVIDUAL LETTER 810: UNKNOWN (4)

Response to Comment Ind 810-1

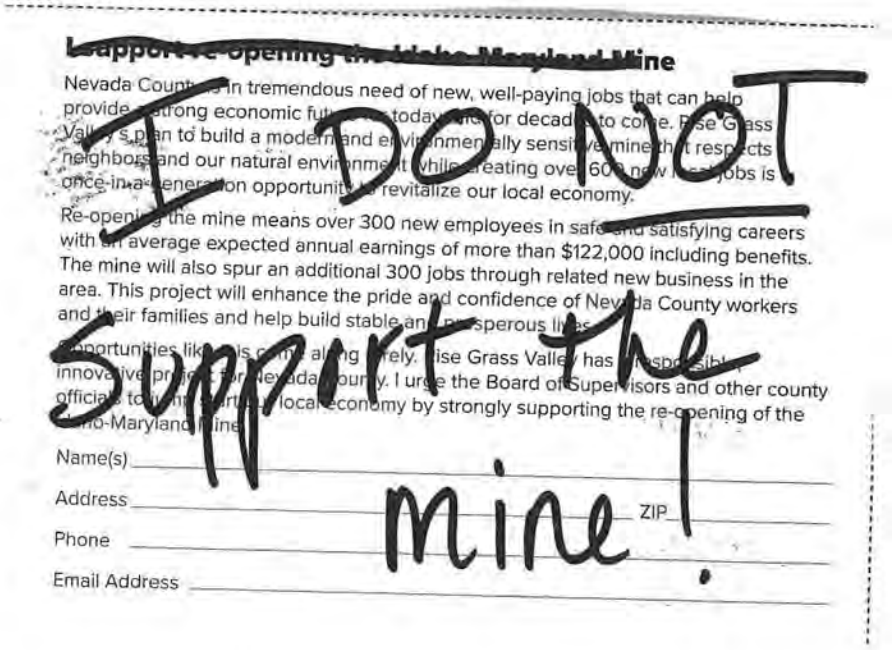
The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. Please see Chapter 4.8, Hydrology and Water Quality, and Master Response 35 regarding water pollution concerns. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 811

Dist 3



Ind 811-1



INDIVIDUAL LETTER 811: UNKNOWN (5)

Response to Comment Ind 811-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 812

Reasons to oppose the Mine:

	Reasons to oppose the Mine:
Ind 812-1	The mine will pollute our air and increase lung disease. Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley.
Ind 812-2	If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years There is serious risk to our health, our environment, our property value, and our peace and quiet.
Ind 812-3	Hard rock mining is the single largest source of toxic waste in the United States.
Ind 812-4	Vast amounts of diesel exhaust will be produce from continuous operation, including the trucking in of explosives.
Ind 812-5	A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential)
Ind 812-6	Crushing of 1,500 tons of mine waste rock every day, all day, using massive machines.
Ind 812-7	Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.
Ind 812-8	Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area (see map)
Ind 812-9	Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years dewatering hundreds of wells.
Ind 812-10	Waste water will be dumped into South Fork Wolf Creek, destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems
Ind 812-11	Use of over 12% of Nevada County's electricity, more than all the County businesses combined.
Ind 812-12	The Rise Gold CEO already has numerous violations of mining and environmental laws.
Ind 812-13	Claims that a few hundred jobs cannot justify the likelihood of increased lung cancer in Nevada County.
Ind 812-14	Nevada County currently has a surplus of unfilled job positions
Ind 812-15	Business that depends on tourism will be hurt.
Ind 812-16	Homeowners can lose an estimated 20% in their property values and more if the wells are dry,
Ind 812-17	A working mine will shatter the peace and quiet of many neighborhoods.
Ind 812-18	Underground blasting is planned for 7 days a week and will be felt by those living above the 2,585 acres of mine underground mineral rights - see map!
Ind 812-19	While Rise Gold shareholders profit, the local community gets little revenue.
Ind 812-20	The relatively few theoretical jobs gained will not offset the harm done.
Ind 812-21	Where will the imported workers live when housing is so limited in our area?
Ind 812-22	An estimated 85% of vendor spending will not be local (explosives, chemicals, concrete, steel…)
Ind 812-23	Nevada County revenue will be from ordinary property taxes, not from gold.
Ind 812-24	The history and business practices of Rise Gold Corp. do not inspire trust.
Ind 812-25	Rise Gold Corp. has never opened a hard rock mine and has never made a profit on its business ventures.
Ind 812-26	Rise Gold CEO, Ben Mossman, has been charged with environmental violations in B.C. Canada
Ind 812-27	There are many questions about the financial stability of Rise Gold Inc.

INDIVIDUAL LETTER 812: UNKNOWN (6)

Response to Comment Ind 812-1
The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The commenter also states the project would result in air quality impacts such as asbestos emissions but does not state how the DEIR is inadequate. Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) analyzed air quality emissions and found the impacts to be less than significant after mitigation.

Response to Comment Ind 812-2
The commenter states that the project would operate 24 hours a day, 7 days a week, and would create a serious risk to health, the environment, and property values, but provides not additional information. The project's proposed hours of operation are described in Chapter 3 (Project Description). The project's operational impacts on the physical environment are evaluated throughout the DEIR. The DEIR is not required to evaluate impacts to property values or quality of life for local residents. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 812-3
This comment does not address an environmental concern or the adequacy of the DEIR. No response is required.

Response to Comment Ind 812-4
The commenter is concerned about the air quality impacts from project trucks but does not state how the DEIR is inadequate. The project's estimated operational air emissions and associated impacts are discussed in DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emission, and Energy). Emissions from diesel trucks and equipment are included in the emissions modeling conducted for the project.

Response to Comment Ind 812-5
The commenter states there is a factory on Brunswick Road in a residential area. This comment does not address an environmental concern or the adequacy of the DEIR. Potential conflicts with existing zoning and other land use designations and policies are addressed in DEIR Chapter 4.9 (Land Use and Population and Housing).

Response to Comment Ind 812-6
The commenter is concerned about rock crushing associated with the project. All rock crushing would take place underground as discussed in Chapter 3 (Project Description) of the DEIR. The DEIR addresses the project's operational impacts including those associated with rock crushing. The commenter is referred to DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).

Response to Comment Ind 812-7
The commenter is concerned about impacts from the project's truck traffic but does not provide specifics or state why the DEIR is inadequate. The project's traffic-related impacts are addressed in DEIR Chapter 4.3 (Air Quality, Greenhouse Emissions, and Energy), Chapter 4.10 (Noise and Vibration), and Chapter 4.12 (Transportation). Visual impacts are addressed in DEIR Chapter 4.1 (Aesthetics).

Response to Comment Ind 812-8

The commenter is concerned about underground blasting. The DEIR addresses the project's potential impacts related to proposed blasting in Chapter 4.6 (Geology, Soils, and Mineral Resources) and Chapter 4.10 (Noise and Vibration).

Response to Comment Ind 812-9

The commenter is concerned about the dewatering of the mine. The project's potential impacts to groundwater resources are evaluated in DEIR Chapter 4.8 (Hydrology and Water Quality). As described in discussion of Impact 4.8-1 on DEIR pages 4.8-41 through -53, mine dewatering water would be treated onsite to remove the constituents of concern – iron and manganese. All discharges would be in compliance with permits from the Regional Water Quality Control Board, which would ensure water quality standards are not exceeded. As described in discussion of Impact 4.8-2 on DEIR pages 4.8-54 through -68, modeling of the project's potential impacts to groundwater supplies identified the potential to adversely affect seven domestic water supply wells – not hundreds of wells as the commenter asserts. Each of the groundwater related technical studies prepared for the project was reviewed by a third party with expertise in the field to ensure accuracy and adequacy. The commenter is referred to Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 812-10

The commenter is concerned about contaminants of concern in the treated water discharged to South Fork Wolf Creek. The commenter is referred to Response to Comment Ind 812-9. All discharges to South Fork Wolf Creek would be in compliance with permits from the Regional Water Quality Control Board, which would ensure that water quality standards are not exceeded. The project's potential impacts to downstream riparian habitats are addressed in DEIR Chapter 4.4 (Biological Resources). The commenter is referred to Master Response 35 – Discharge to South Fork Wolf Creek, and Response to Comment Grp 25-30 regarding legacy contaminant concerns.

Response to Comment Ind 812-11

The commenter is concerned about the project's energy consumption. The commenter is referred to Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Ind 812-12

The commenter refers to the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 812-13

The commenter states that the project will cause lung cancer. The project's potential to emit toxic air contaminants (TACs), such as asbestos, is evaluated in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). The impact is found to be less than significant after implementation of mitigation.

Response to Comment Ind 812-14

This comment does not address an environmental concern or the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 812-15

The comment does not address an environmental concern or the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 812-16

The comment does not address an environmental concern or the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 812-17

The commenter states that the project will ruin the peace and quiet for residences surrounding the Idaho-Maryland Mine. The project's potential noise impacts on surrounding residences are evaluated in DEIR Chapter 4.10 (Noise and Vibration). The commenter is also referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 812-18

The commenter states that the project will conduct underground blasting 7 days a week and references the extent of the mineral rights boundary. Regarding the mineral rights boundary, the commenter is referred to Master Response 7 - Location of Future Mining Areas.

Regarding the underground blasting, the project's potential to cause ground borne vibration at existing residences is evaluated in Chapter 4.10 (Noise and Vibration), under Impact 4.8-4. The impact evaluates potential vibration impacts at various sensitive receptors near the project site. Mitigation Measure 4.10-4 requires implementation of a Ground Vibration Monitoring Program to ensure vibration levels remain below 0.4 inches/second at sensitive receptors such as residences. The placement of two seismographs would be required at nearby residences. With this mitigation measure, the impact was determined to be less than significant.

Response to Comment Ind 812-19

The comment does not address an environmental concern or the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts

Response to Comment Ind 812-20

The commenter references the economic impacts of the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts

Response to Comment Ind 812-21

The commenter asks where project employees from outside of the region will live. An evaluation of the project's potential effects related to population growth and housing is provided in DEIR Chapter 4.9 (Land Use and Population and Housing). According to the discussion of Impact 4.9-3 on DEIR pages 4.9-25 through -27, "[d]ue to Nevada County's current vacancy rates, Nevada County has sufficient available housing stock [12,098 vacant housing units] to accommodate the entire estimated workforce for the project" (312 workers).

Response to Comment Ind 812-22

The commenter references the project's economic impacts. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts

Response to Comment Ind 812-23

The commenter references the project's economic impacts. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts

Response to Comment Ind 812-24

The commenter references the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 812-25

The commenter references the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 812-26

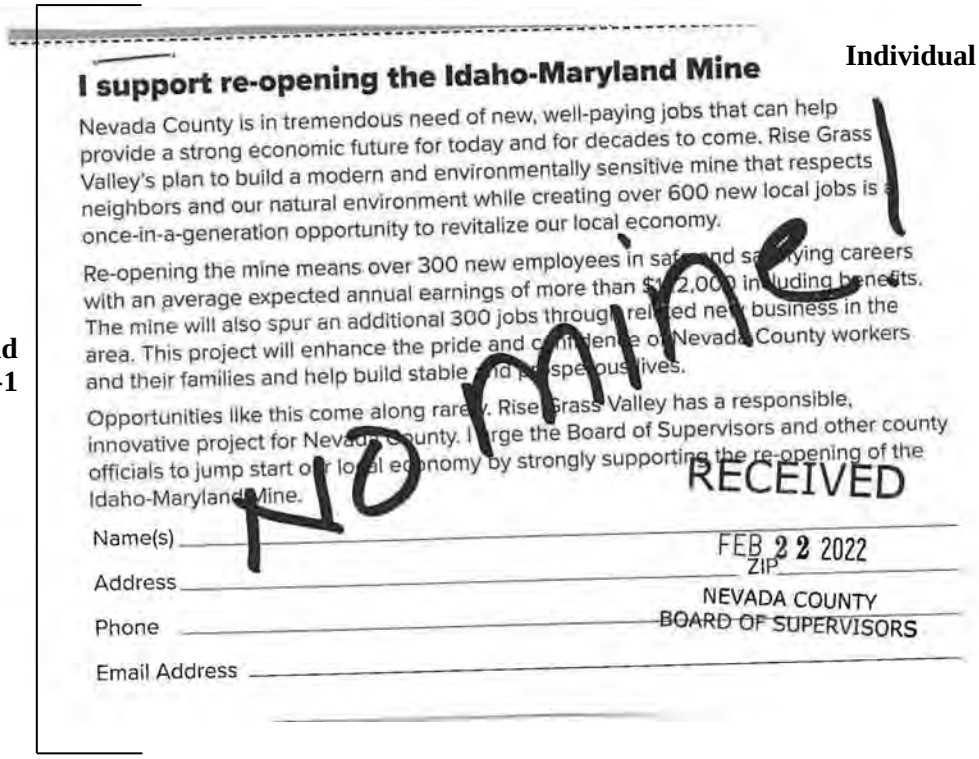
The commenter references the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 812-27

The commenter references the financial condition of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

Individual Letter 813

Ind 813-1



I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in saf[illegible]nd sa[illegible]rying careers with an average expected annual earnings of more than $[illegible]2,000 in[illegible]luding benefits. The mine will also spur an additional 300 jobs throug[illegible]rel[illegible]ed ne[illegible] business in the area. This project will enhance the pride and c[illegible]nfidence o[illegible] Nevada County workers and their families and help build stable [illegible]nd p[illegible]spe[illegible]us lives.

Opportunities like this come along rare[illegible]. Rise Grass Valley has a responsible, innovative project for Neva[illegible]ounty. I[illegible]rge the Board of Supervisors and other county officials to jump start o[illegible] lo[illegible]al e[illegible]nomy by strongly supporting the re-opening of the Idaho-Maryland Mine.

No mine!

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

INDIVIDUAL LETTER 813: UNKNOWN (7)

Response to Comment Ind 813-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 814

From: notmymine@yahoo.com
Sent: Saturday, April 2, 2022 10:18 PM
To: Idaho MMEIR
Subject: Economic Impact of the Idaho Maryland Mine

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board of supervisors, i ask you,
what kind of ancestor do you want to be?
what kind of elder are you?
what kind of legacy do you want to leave?

who stands to lose the most from the mine? the already-disenfranchised, doing their best to survive
and you, the wealthy elite, what do you yourself stand to lose from perpetuating destructive,
extractive, abusive tactics on this land?
when your children's children inherit this earth,
what story will they tell of you and your work?
or more importantly, what will even be left for them?

what will it take for you to see exactly what's at stake?

Ind 814-1

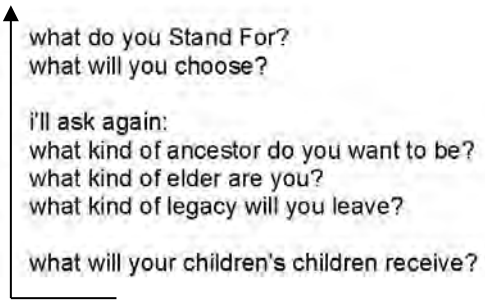
what will it take to stop this transgression?
what storyline needs to be rewritten
for you to understand the enormous harm that will come to pass
by reopening the mine?

reopen your mind
or you will find the harm on your hands
you will find yourself responsible for the harm to this land
you will find your story tainted, your legacy painted with the suffering,
with the degradation of everything that makes this life worth living

open your eyes.
this place is already Gold & golden.
we don't need a mine to turn our insides out and tells us what we're about;
to smoke us out and shush our sound with soot and deafening loud;
to dry our wells and waste our waters with poisons that always stick around
- long after you are gone,
the mine would live on to loot our earth and pollute our air, and harm our kin - the human and other-than

what do you truly stand to gain?
what do we all, truly, stand to lose?

1

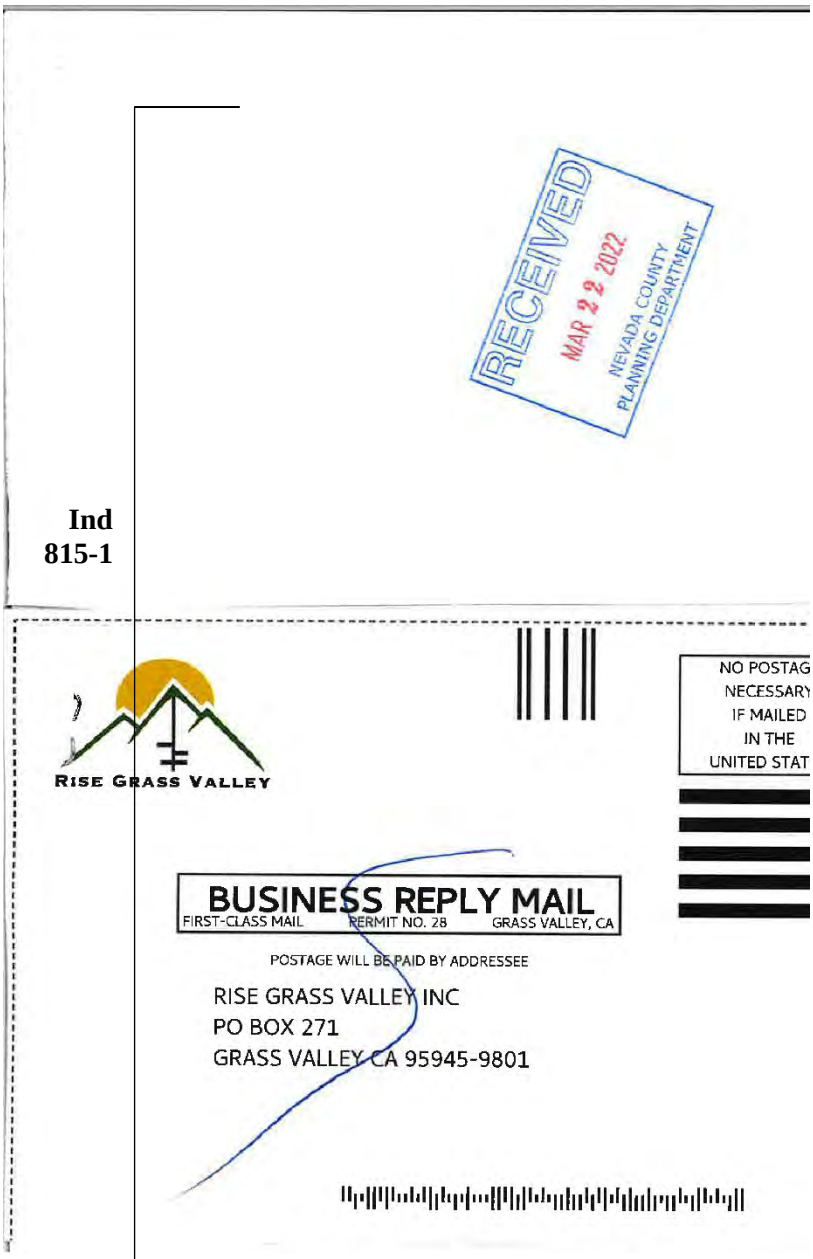

what do you Stand For?
what will you choose?
i'll ask again:
what kind of ancestor do you want to be?
what kind of elder are you?
what kind of legacy will you leave?
what will your children's children receive?

INDIVIDUAL LETTER 814: UNKNOWN (8)

Response to Comment Ind 834-1

The comment letter does not address the adequacy of the DEIR. The comment has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 815



Ind 815-1

upport re-opening the Idaho-Maryland Mine

vada County is in tremendous need of new, well-paying jobs that can help
vide a strong economic future for today and for decades to come. Rise Grass
ley's plan to build a modern and environmentally sensitive mine that respects
ghbors and our natural environment while creating over 600 new local jobs is a
ce-in-a-generation opportunity to revitalize our local economy.

-opening the mine means over 300 new employees in safe and satisfying careers
h an average expected annual earnings of more than $122,000 including benefits.
e mine will also spur an additional 300 jobs through related new business in the
ea. This project will enhance the pride and confidence of Nevada County workers
d their families and help build stable and prosperous lives.

portunities like this come along rarely. Rise Grass Valley has a responsible,
novative project for Nevada County. I urge the Board of Supervisors and other county
icials to jump start our local economy by strongly supporting the re-opening of the
ho-Maryland Mine.

me(s) _____

ldress _____ ZIP

one _____

nail Address _____

FEB. 28, '22

DEAR PLANNING COMMISSION

WE ARE LONG-TIME RESIDENTS OF THE AREA, JUST OFF BENNETT ROAD. WE, AND OUR NEIGHBORS ARE COMPLETELY OPPOSED TO ANY NEW OR RE-OPENING OF THE MINES. THEY HAD THEIR DAY. PLEASE JUST ALLOW US PEACE IN OUR NEIGHBORHOOD FOR OUR FINAL YEARS — (WITHHOLDING OUR NAMES)

INDIVIDUAL LETTER 815: UNKNOWN (9)

Response to Comment Ind 815-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 816

Ind 816-1

I'm not providing my name as I am concerned about reprocussions as the LLC. has blocked me & deleted my comments/questions on socialmeadia as it is. I worked commerical const for over 25 yrs & my eduation is in architure & encerg mgt, where I learned to read & write EIRS.

My questions are as follows:

Ind 816-2

1. What is back up & back up to the back up Plan given extended power outages that we in the community are susceptible to. Some of these are "acts of god" creating the concern that WHEN things go awry & on/under treated water hits local surface watershed & creeks etc. No leagal responsibilty

Ind 816-3

2. After 2 yrs of 174 const (which Im not sure wasn't lobbied for by the interests of th LLC.) the trucks on road are felt & heard in the homes. This, over 500% increase in truck traffic, is not acceptable.

Ind 816-4

3. There is no reason why exact equip to be used could not have been used in the study re: noise & emmissions rather the "typical" or "potential"

Ind 816-5

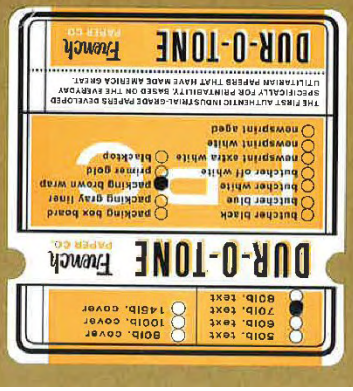
4. Just as no one knows exactly where the gold is, no one knows exactly how the fisures & aquifers are connected. My current well is 900' deep. If NID is already "waterbound" The drought is getting more extreme & avg precipitation trend decreases in the last 100 yrs that's the precise plan to deal w/

Ind 816-6

with this? after reclamation? How can the L.L.C. not pay for useage as well as infrastructure to the known locations where water will be lost.

In closing, please keep in mind boundary capacity & this is a LIMITED LIABILITY CORP.

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT



INDIVIDUAL LETTER 816: UNKNOWN (10)

Response to Comment Ind 816-1
The comment is an introductory statement and does not address the adequacy of the DEIR.

Response to Comment Ind 816-2
Please refer to Chapter 4.11, Public Services and Utilities, for information related to electricity supply, and Chapter 4.8, Hydrology and Water Quality, for information related to surface water quality. Please also see Master Response 35 – Discharge to South Fork Wolf Creek.

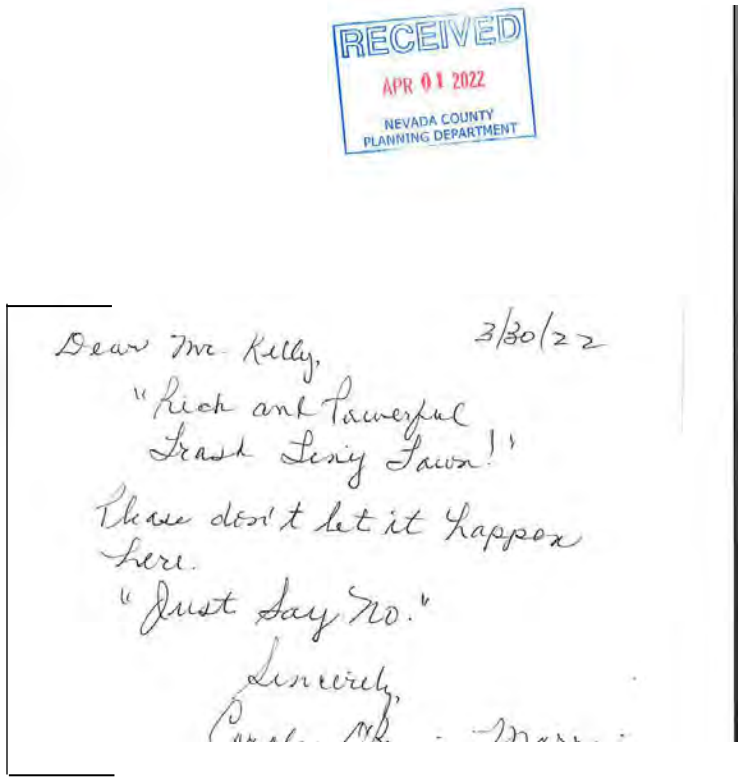
Response to Comment Ind 816-3
The comment appears to pertain to construction along SR 174 which is not related to the proposed project. Please see Chapter 4.12, Transportation, for additional information related to impacts associated with truck traffic. Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Response to Comment Ind 816-4
The modeling conducted for the air quality and noise analyses was done using reasonable assumptions, which is adequate under CEQA. Engineering level detail, such as actual brands of equipment, is not required in an EIR. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26.)

Response to Comment Ind 816-5
Please refer to Master Response 7 – Location of Future Mining Areas. Additionally, regarding water well and drought concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16, which relates to drought conditions.

Response to Comment Ind 816-6
The comment does not address the adequacy of the DEIR. The comments have been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 817



Ind 817-1

INDIVIDUAL LETTER 817: UNKNOWN (11)

Response to Comment Ind 817-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. The comment has been noted for the record and forwarded to decision-makers for their consideration.

Individual Letter 818

From: Uta Reimnitz
To: Idaho MMEIR
Subject: Mine comment 2:45pm
Date: Friday, March 4, 2022 2:53:22 PM

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To whom it may concern,

I am a single mother to a young son, and a homeowner off of Burma, less than a mile away from the proposed mine site, I am strongly AGAINST the mine going in! My house water supply comes from my well, and my irrigation water from the NID ditch above my home, and I am concerned not only about the quantity of water that I will have, but also the quality. I know the claim by Rise is that our supplies will not be affected, but I don't believe it. It takes huge amounts of water for this sort of operation, and it would without a doubt suck from our groundwater table. I is impossible to think that sucking out huge amounts of water would not lower our groundwater. I am dipping into my savings every month as it is, and if my well runs dry, I will not have the money to purchase water from anywhere else. Flat out I am not in a position to purchase water.

Ind 818-1

The claim by the mine operation is also that it will not add to the pollution of our environment or our water. This is also a flat out lie. I am concerned about the amount of new traffic that a mine production would create, the noise and air pollution that comes with this. Each year the traffic in our area gets worse, and that is not what I moved here for 6 years ago. I chose this small community for a quiet, peaceful lifestyle. I don't want to hear big trucks or additional traffic on Brunswick, the road that runs by my house. I also don't want to be stuck behind more traffic, road blocks during construction, and overall traffic that bringing in more people and industry will do.

Ind 818-2

I am also concerned about what disturbing the water in the process of reopening the mine will release into our groundwater and subsequently into our wells and irrigation ditches, water which we use to grow food that we eat. Not to mention what additional chemicals will be released from the mining process. Disturbing the water will release chemicals from the previous mining days of this area without a doubt. I hear about the effects of small-scale disturbances of the water all of the time, and a big scale operation would disturb the water in a huge way, releasing old sedentary toxins, and be devastating to the safety of our water, wildlife and environment!

Ind 818-3

The claim is that the mine would create jobs for the local economy, but the amount of well-

Ind 818-4

paying jobs is miniscule in comparison to the risks and assault on our community by an outside company, with ties even outside of our own country. Why should we allow a foreign company to take our resources and endanger the people of our community's health and well-being? All for financial gain for them??? Or would the gain also be for our lawmakers?

We need to stick together as a community and not allow this atrocious idea and plan to manifest. I feel that if the local government allows this to happen, it must be in their own best interest for financial gain, and I truly hope that they would now allow this to happen to their people. We would go down in the history books as another Flint water crisis, and I don't want this to happen. Please do NOT allow this to happen, in the name of our community, our environment and our children.

Thank you.
Uta Reimnitz
415-244-1546

Ind 818-5

INDIVIDUAL LETTER 818: UTA REIMNITZ

Response to Comment Ind 818-1

The commenter's general opposition to the project is noted for the decisionmakers. The commenter is referred Master Response 1 - Non-EIR/Administrative Issues. The commenter also states that the project will diminish the quantity and quality of water from the private well on the commenter's property, but does not explain how the DEIR is inadequate in this regard. The DEIR found that the project's impacts to water quality and groundwater supplies would be less than significant. (DEIR, Section 4.8-41, 54.) The commenter is referred to Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 818-2

The commenter states that the project will pollute water resources near the project. Because of the comment's similarity to Comment Ind 818-3, the commenter is referred to Response to Comment Ind 818-3 regarding water pollution. The commenter is also concerned about the project's traffic-related impacts. Chapter 4.12 of DEIR concluded that all traffic-related impacts would be less than significant after mitigation, with the exception of the intersection of SR 174/Brunswick Road (level of service impact) and Brunswick Road/Sutton Way (queueing impact). (see generally DEIR, Chapter 4.12.)

Response to Comment Ind 818-3

The commenter states that the project would result in disturbances and pollution of water. The commenter also state that additional chemicals would be released due to the mining process. The commenter is referred to Chapter 4.8 of the DEIR (Hydrology and Water Quality), Master Response 8 - Mine Waste Characterization, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 - Flows in South Fork Wolf Creek. Regarding legacy mining concerns, please see Response to Comment Grp 25-30.

Response to Comment Ind 818-4

The commenter states that the benefits of increased employment from the project are outweighed by the risks of a "foreign company." The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 818-5

The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 819

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) V. Kuch

Address 10350 Smith Rd ZIP

Phone Grass Valley 95949

Email Address Vkeeni KB@sbcglobal.net

Please DO NOT Support the mine reopening.

Dist 3

RECEIVED

FEB 25 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Ind 819-1

RISE GRASS VALLEY

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RISE GRASS VALLEY INC
PO BOX 271
GRASS VALLEY CA 95945-9801

INDIVIDUAL LETTER 819: VALERIA KACH

Response to Comment Ind 819-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 820

RECEIVED
APR 04 2022
NEVADA COUNTY
COMMUNITY DEVELOPMENT

Response to RISE DEIR concerning fire and wildfire.

I am a resident of Nevada County. I am particularly interested in Rise's plans to reduce the risk of fire and to fight it should one develop. I have spent a great deal of time getting my own property cleared of ladder fuel, thinned removing many trees, and working with neighbors to create a safer boundary between properties. I have a son who is a career firefighter in this area.

Ind 820-1

Fire and Wildfire is a focused concern I have and find the DEIR inadequate in addressing the issues. The report seems to let other agencies "shoulder the load" for these two related areas of concern. The responsibility is put upon the surrounding fire departments, NIDs water lines, PGE's maintenance of power lines. Rise is limited itself to following types of compliance: adhering to building codes that include fire risk reduction materials and sprinklers and having an emergency EMT crew on trained and on-hand. Rise will also follow a vegetation plan to reduce ladder fuels and remove some of the forested area on the properties. (pdf page 986). This is no more than many to most neighbors are doing. The critical difference being: the neighbors aren't bringing in explosives and detonators, they aren't storing large quantities of diesel fuel in 12,000 gallon tanks above ground (pdf page 992), they aren't located at a major evacuation intersection for one of the largest neighbor hoods in the Grass Valley area. These and other concerns make the re-opening of the mine very risky.

Ind 820-2

The DEIR reported that there are several fuel reduction programs going on. I know the Office of Emergency Services (OES) has been active in cutting breaks and sponsoring the Green Waste Drop Off through their organization with grants and currently staffing the County sponsored drop off. One of the proposed projects identified in the DEIR was to be on Greenhorn, East of Bennett. (FYI - all of Greenhorn is east of Bennett.) As a side note, it is interesting that Rise has provided that space and I am appreciative of the temporary use of the Brunswick site for this propose. At the same time, I wonder why Rise personnel aren't out reducing ladder fuels on their own property. There are substantial amounts of scotch broom, dense trees that need to be thinned, downed and broken trees scattered across the property I can see from my car. I understand that this will be addressed in the vegetation plan if and when the mine is approved, but right now is the beginning of the 2022 fire season. Being a good neighbor NOW would demonstrate a commitment to the region very different from future promises to do the same.

Ind 820-3

The DEIR cites several nearby fuel reduction projects but the 2 that got my attention were:

> "With respect to planned but not yet funded fuel treatment projects in the immediate vicinity (i.e., grant application submitted but award not yet confirmed), the primary project is roadside vegetation management (to create defensible space) along East Bennett Road, where the potable water pipeline would be installed, as well as the portion of Brunswick Road along the frontage of the Brunswick Industrial Site. Similar roadside vegetation management is also proposed along Greenhorn Road, east of the Brunswick Industrial Site." (pdf page 973).

I was curious which came first - the need to clear vegetation to install the new NID pipe along Bennett or the need to reduce the fire fuels near where trucks carrying explosives will travel.

Either way reducing the fuel load along these 2 roads is important. The Greenhorn project I wondered about. Vickie Deam, the Greenhorn Firewise Community leader, knew nothing about a proposed project. She noted that the county crew came in a year or so ago and walked Greenhorn to cut back right-of-way fuels and used heavy equipment to clear taller vegetation and trees as needed. The neighborhoods have done a tremendous job of clearing, thinning and opening up the properties, at least as far as I drive a couple of miles up Greenhorn. I know of several neighborhoods who live on side streets from Greenhorn collectively clearing road right-of-ways to allow better clearance for emergency vehicles. The person at FireSafe Council spoken with didn't know of any proposed projects but would check further. The same was true of Office of Emergency Services, waiting on a call back. Where did the DEIR authors find information on this proposed project? Who is proposing it and what grant agency would consider it?

The section on Topography and Vegetation (pdf page 971) is not adequate. Once again, Rise considers their narrow scope of needs at the expense of seeing the bigger picture immediately outside the above ground site boundaries but still inside the mineral boundary. The report says there are "no significant slopes such as those in steep-walled canyons or mountainous valleys" nearby. Slopes are an important factor in fires as fires burn upslope, with the heat rising drying the flammable materials/vegetation located above the advancing fire. Rise's DEIR dismisses the upward burn of fires because steep slopes occur over 3 miles from the Brunswick site. What the authors failed to do was walk around the site and see that much of the proposed mine buildings above ground are in one of the lowest area. Hills rise in most directions and Banner Mountain rising a further NE from the Brunswick site.

Ind 820-4

According the elevation measurements on ***Google Earth*** the mine shaft estimated location is 2761 feet in elevation. The houses selected are random to represent different directions from the Brunswick site.

General area Location	Elevation	General Direction from site
Mine shaft	2761 ft.	On Brunswick site
Mine pond	2716 ft.	On Brunswick site
Intersection Bennett/Brunswick	2817 ft.	North East -adjoining Brunswick site
12171 Brunswick	2851 ft.	North across the street from site
14278 LaNoria	2911 ft.	West
11144 Cedar Ridge	2975 ft.	South (slightly east)
Y intersection 174 & Brunswick	2864 ft.	South (slightly west)
Airport runway	3070 ft. to 3154 ft.	Northeast

The change of elevation ranges (from the existing shaft) from about a 50-foot rise to about 300 at the airport. Just because these are not steep slopes, they will still have fire burn rapidly up the hill sides affecting fire behavior. The possibility of this happening is real as the region is classified as ***Very High Fire Hazard Severity Zone***.

Ind 820-5

Rise commits to having diesel trucks to cease their delivery trips and/or pull off the road in the case of an emergency. Driving Brunswick, Bennett, and Crown Point/Centennial often there aren't a lot of places to pull off with a truck that large.

Ind 820-6

The worst-case scenario of a fire starting on the Brunswick site is a possibility as explosives are delivered and stores prior to use, 2 large diesel fuel storage tanks will be above ground, the increased diesel trucks on the road increases the likely hood of an accident that could spark a fire. The current plan calls for Cal Fire to respond from Ridge Road. The current plan also is to have sprinklers and a 30 and 100 foot defensible space around buildings helps those on site. Vegetation management will eventually help reduce a fire from spreading up the hill. But light winds and embers carried across roads will spread the fire to nearby neighbors and beyond.

Ind 820-7

What else will Rise do to address this? It is generous that they are donating a firetruck and the FTE for 3 more firefighters but fighting fires on Greenhorn is a huge concern. The NID supplied water ends just over 1 mile from Brunswick, everyone else is on wells. Currently a fire out on Greenhorn involves tanker trucks delivering water and returning to the hydrant near Brunswick, filling up and going back to the fire event. This might be a 45-minute round trip depending on the fire location. Some homes have storage tanks but having talked to firefighters who say that these may not be safe as the years of build-up in the tanks could ruin a pump filter, eliminating the use of the equipment. If in doubt, the stored water would not be used. Greenhorn is the main evacuation route for about 1200 people or more. (In 2021 Greenhorn FireWise Community mailed 787 letters to addresses associated with Greenhorn or roads that adjoin it. In 2021 FireSafe estimated 748 parcels with 598 of them improved. Estimate 2 people per home 600 x 2 = 1200 a conservative estimate) Brunswick is a "secondary evacuation route". It carries a significant traffic each day and in an emergency this road would be primary way out of town as smaller collector streets fed into it and then into Highway 174. A fire blockage at the Brunswick/Greenhorn would be a disaster. But most residents would leave using Greenhorn and emergency equipment would use Greenhorn to reach the fire to fight it. (Note 2 other Greenhorn evacuation routes: a one lane road exit on Lost Lake goes to You-Bet and then to highway 174. A second route winds up Greenhorn to Banner Lava Cap area where others living there would also be trying to evacuate.) If the fire spread it could impact the ability to use the resources at the nearby Air Attack Base located at the airport, which could affect the entire region's firefighting response.

Ind 820-8

What could Rise do to reduce the fire risk? One suggestion is to follow the lead of the Greenhorn FireWise Community's collaboration with the Joint Fire District working to install two 20,000-gallon water tanks at intervals along Greenhorn for fighting wildfires. Rise could install one or two 20,000-gallon water tanks dedicated to fire fighting on their Brunswick and Centennial sites. They would be located for easy access by fire department. This is one way to address a worst-case scenario and helps meet the Nevada County General Plan Policy EP-10.1.4 about adequate evacuation routes. It also supports policy EP-10.1.11 to *incorporate appropriate fuel modification around development and emergency ingress and egress for residents, visitors and emergency services*. For Rise this would be for mine operation workers and residents in the mineral boundary near the Brunswick and Centennial sites. Policy FP-10.8.4 supports *new development include adequate emergency infrastructure that includes but*

not limited to emergency water facilities, ingress/egress routes to facilitate evacuation of residents and maintain them. This would be pro-active on Rise's part instead of primarily depending on local agencies to provide services and respond when needed.
DEIR states:

> "In the unlikely event of a vegetation fire at either the Centennial or Brunswick Industrial Sites, resulting from on-site project operations, CAL FIRE would respond out of Station located at 10242 Ridge Road, Nevada City" Page 4.13-21

What other ideas has Rise developed to deal with the development of worst-case fire disaster at the mine that would likely spread into nearby homes and beyond. Without planning to "protect" the Brunswick and Bennett/Greenhorn intersection in an emergency situation possibly stemming from a mine accident, then concern **4.13-1** is **more than significant.** Not having some type of additional "protection" could "substantially impair an emergency response or evacuation".

Ind 820-9

Rise needs to be more comprehensive in not only following codes but also planning for more options to prevent and fight fires in the immediate mineral boundary area not just on their building sites. What water service can it provide to the providers? What can be done to secure more of the 2585 acres in the mineral boundary? What can be done if the NID's water lines were damaged? How would fire be addressed then?

Respectfully,

Victoria Rubiales

Victoria Rubiales
11371 Marjon Drive
Nevada City, CA 95959

INDIVIDUAL LETTER 820: VICTORIA RUBIALES

Response to Comment Ind 820-1

The commenter states that the DEIR's Wildfire chapter is inadequate (Chapter 4.13) because the Project Applicant is not undertaking enough measures to mitigate wildfire risk. The commenter states that the Project Applicant's implementing measures such as adhering California Building Code standards, implementing a vegetation management plan, or training an on-site EMT crew is insufficient. The commenter also states that certain project characteristics exacerbate the risk of wildfire, such as the transport of explosives, the storage of diesel fuel, and that the Brunswick Industrial Site sits at an intersection used for evacuation by a large neighborhood.

However, the commenter does not explain how the DEIR fails to address these project components in the context of wildfire impacts. For example, the DEIR states that the project would have a less than significant impact on substantially impairing an emergency response or evacuation plan because in the event of an evacuation, the Idaho-Maryland Mine operator would be instructed to cease all trucking operations. (DEIR, p. 4.13-17.) The installation of two, 12,000-gallon above-ground diesel fuel storage tanks would be located away from vegetation in the industrial complex building area and, as a Class II liquid, would be regulated in accordance with the California Fire Code (CFC). This CFC requires robust design requirements to minimize fire hazard to the maximum extent feasible, including but not limited to requirements for overfill protection, spill containment, and dispenser emergency shutoff valve. (DEIR, p. 4.13-24.) The DEIR also states that the transport, storage, and use of explosives for underground mining has an excellent safety record as it is highly regulated at all levels of government (e.g., federal, state, and local). (DEIR, p. 4.7-23–28.)

Lastly, the commenter does not identify what mitigation measures the DEIR would need to include to render the project safe from a wildfire perspective.

Response to Comment Ind 820-2

The commenter states that the Project Applicant should be reducing ladder fuels on the Brunswick Industrial Site currently now rather than waiting for certification of the DEIR and project approval. This comment does not address the adequacy of the DEIR. The comment is noted for the decisionmakers. The commenter is also referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 820-3

The commenter asks whether a fuel treatment effort along East Bennet Road would occur because of the need to install the water pipeline or the need to reduce fire fuels where explosives will be transported. The project does not propose to remove vegetation for the transport of explosives. Moreover, the project does not propose to conduct fuel treatment along East Bennett Road and installation of the potable water pipeline is separate from fuel treatment efforts. The commenter also asks where the DEIR learned of the fuel treatment effort along Greenhorn Road. Data for fuel treatment efforts is sourced from the Yuba Forest Network Stakeholder Mapping Project, which is led by the South Yuba River Citizens League's (SYRCL) Yuba Forest Network in collaboration with the County of Nevada Office of Emergency Services. (DEIR, p. 4.13-5, fn. 3.)

Response to Comment Ind 820-4

The commenter states that the DEIR is inadequate with respect to the description of topography and vegetation of the Brunswick Industrial Site because of the low elevation of structures on the Brunswick Industrial Site. However, the DEIR addresses this on page 4.13-22, noting that the

incorporation of defensible space around proposed structures at the Brunswick Industrial Site, as well as designing buildings in conformance with Chapter 7A of the CBC, would help to slow the spread of wildfire moving through the area. In addition, proposed improvements at both Sites would reduce the vegetation fuel load in the area. Nevertheless, vegetation would remain on both Sites and would need to be managed on an ongoing basis. In addition, use of hydrocarbon-powered heavy-equipment on-site could exacerbate wildfire risk. Mitigation Measure 4.13-2, which includes a vegetation management plan, would reduce this risk to less than significant. Nevertheless, the DEIR remains accurate in stating that those topographical characteristics and features that exacerbate wildfire risk (e.g., steep-walled canyons) are not as prevalent on-site as they are in other regions in Nevada County.

Response to Comment Ind 820-5

The commenter states that the certain roads used by project trucks are too narrow for trucks to pull off of the side of the road in the event of an emergency or evacuation. The commenter is referred to Master Response 5 - Evacuation Zones.

Response to Comment Ind 820-6

The commenter states that because of the transport and storage of explosives to the Brunswick Industrial Site and the installation of two diesel fuel storage tanks, a fire may start at the project site. This comment does not address the adequacy of the DEIR. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As already discussed (820-1), transport of explosives and design of above-ground diesel storage tanks are both highly regulated by the government.

Response to Comment Ind 820-7

The commenter provides a narrative on fire safety in the Greenhorn Road area, but does not provide a comment on the adequacy of the DEIR. Please see Master Response 5 – Evacuation Zones.

Response to Comment Ind 820-8

The commenter states that the Project Applicant should install large water tanks at the project sites to mitigate fire risk. However, the DEIR's Chapter 4.13 (Wildfire) already determined that wildfire impacts are less than significant after mitigation. As stated on page 4.13-22 of the DEIR, the Centennial and Brunswick Industrial Sites have limited steeply-sloping topography that is known to exacerbate wildfire risk and spread. Prevailing wind conditions within the surrounding area are from the North-East and South-West directions, both of which have forest lands. The incorporation of defensible space around proposed structures at the Brunswick Industrial Site, as well as designing buildings in conformance with Chapter 7A of the CBC, would help to slow the spread of wildfire moving through the area. In addition, proposed improvements at both Sites would reduce the vegetation fuel load in the area. Nevertheless, vegetation would remain on both Sites and would need to be managed on an ongoing basis. In addition, use of hydrocarbon-powered heavy-equipment on-site could exacerbate wildfire risk. Without implementation of a vegetation management plan, the project could have a significant impact related to exacerbating wildfire risks, and thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Implementation of the Mitigation Measure 4.13-2 would reduce the above potential impact to a less-than-significant level.

The commenter asks what the Project Applicant could do to reduce fire risk. As stated on page 4.13-20, two existing fire service lines extend into the Brunswick site. The project also generates approximately 850 gallons per minute of groundwater which is treated and could be available for additional water needs if required. As discussed on page 4.11-25 of the DEIR, the mine's own rescue team, which would total 24 members and include five EMTs, would be on call to respond to emergencies. Pursuant to MSHA, a minimum of two teams is required to be available within a one-hour travel time to respond to the mine site. The mine rescue teams would be fully trained and equipped with personal protective equipment, closed circuit rebreather apparatus for underground, open circuit self-contained breathing apparatus for surface responses, oxygen and equipment supplies, gas testing equipment, thermal imaging cameras, communication devices, fire fighting vehicles, hand tools, pumps, hoses, and other equipment. All equipment would be kept at the Brunswick Industrial Site and would not require expansion or new emergency response facilities.

Response to Comment Ind 820-9

The commenter states that the Project Applicant needs to include more measures to address wildfire risk. However, the DEIR has already determined that wildfire impacts are less than significant after mitigation. The commenter is referred to Chapter 4.13 (Wildfire) and the above response.

Individual Letter 821

From: Virginia Moran <vsm@ecooutreachvsm.com>
Sent: Saturday, March 26, 2022 3:57 PM
To: Idaho MMEIR
Subject: Comment on the Mine

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Ind 821-1

Opposed.

Virginia Moran, 20 year resident/Biologist

INDIVIDUAL LETTER 821: VIRGINIA MORAN

Response to Comment Ind 821-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 822

From: Wade Laughter <wade@houseofharlequin.com>
Sent: Monday, April 4, 2022 3:06 PM
To: Idaho MMEIR
Subject: Objection to the DEIR and the mine

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Ind 822-1

It should be very clear to anyone who reads the DEIR that the data and suggested mitigations are at the least heavily slanted in favor of the organization that paid for the DEIR. As it should be, they paid for it.

However, the issue is of interest to those of us for whom this is our home and our community. We have invested our life and families here. It is not about the money to be made. All of the effects described in the DEIR and the talk of mitigating those effects gloss over the central question. The question is "Why do we want or need this mine in our community?" All of the problems inflicted on this community so a canadian company can take the profits of their mine elsewhere. It would be different if this project added some benefit to our community like growing food or generating electricity with no greenhouse gas emissions. But instead we are promised a handful of dangerous jobs and many negative environmental impacts.

The team of folk from RiseGold have a poor record for obeying local rules and cleaning up after their work is no longer profitable. How can we, the taxpayers and voters of Nevada County trust this company to do right here? In looking at other mines around the world it is extremely rare to find a mine so close and uphill from a city like Grass Valley. It is even more rare to find a mine operator that is environmentally responsible and a good neighbor to the community it operates in. Why should we trust this company to treat our community fairly?

I respectfully ask that our county deem the DEIR insufficient in its findings and deny the permit to reopen the Idaho Maryland mine. It is only a benefit to a few people and the hazards and potential problems are a concern to everyone who lives here because we love this place and the community we are creating.

Wade Laughter, district 1 voter, taxpayer and community member for life.

INDIVIDUAL LETTER 822: WADE LAUGHTER

Response to Comment Ind 822-1

The commenter suggests that the DEIR is biased because it was paid for by the Project Applicant and based on their information. The CEQA Guidelines allow a Project Applicant to prepare a DEIR as long as the lead agency, in this case Nevada County, independently reviews the DEIR. (14 CCR 10584(d)(3); (e).) Not only did the County independently peer review the information provided by the applicant, but the County hired Raney Planning and Management to prepare the DEIR. Please see Master Response 1 and Master Response 3. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 823

From: Joan Staffen
To: bdofsupervisors
Subject: Comment on Re-Opening of Idaho-Maryland Mine by Rise Gold & EIR Report
Date: Wednesday, March 2, 2022 12:51:10 PM

Dist 3

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General Comments on the Idaho-Maryland Goldmine Opportunity in Nevada Enterprise, IMgone, project EIR

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

Ind 823-1

Even before reading the subject, EIR most will conclude that for the city planners to even consider reviving a mining project in Grass Valley is on its face strange and repugnant. Strange because to open such an ecologically, economically, community, culturally, and socially disruptive business tortures common sense. Repugnant because it makes no business logic from any position, save the one where proponents raise money, enrich themselves and then flee the country, leaving investors and the people of Grass Valley to clean up the enormous damage and irreparable harm.

Ind 823-2

This exact scenario played out on a much small scale, in Canada where Rise Gold first conceived this practice and was a dress rehearsal for IMgone. Just the act of a town council entertaining this predatory business practice substantially legitimizes a fraud parading around as a corporate mining business. A costly court cause of action for an injunction is looming, and not only on the EIR process but on Riser Gold as well. It is well known that Rise Gold is undercapitalized and that a common red flag for this kind of scheme. County money should be spent seriously investigating Riser Gold and the proponents of IMgone. Where are the hundreds of $millions to re-open Chernobyl going to come from and the $Billions to close Pandora's box once re-opened?

Ind 823-3

Perhaps the city council should take a field trip to any of the public gold mine parks for a look into the past. Historically the gold mining operations in Nevada County controlled and affected everything and everyone in the community, which served the mine mostly to enrich a few owners. Nothing wrong with that, it's the capitalist way. But look what was done to the environment, the permanent damage to the rivers and streams, to fish, wildlife, and humans which now must live with mercury poisoning and other toxins.

Ind 823-4

Keep in mind that this happened when the community, environment, and ecology were pristine and regulations were non-existent. Despite the enormity of the damage, the mines were closed down years ago because they became unprofitable. That was when the costs were only considered for the owner's profitability, not the true costs including contaminated soil and water, economic, health, social, cultural, and ecological which have increased several orders of magnitude. Back then you could just take the money and run.

Ind 823-5

But today one needs to consider issues such as large regional wildfires burning toxic materials used and stored at the mine, climate changes creating challenges to energy uses and power outages, fire ignition and control, mass population evacuations, contaminated wells, and surface waters, hazardous waste disposal, toxicity to the environment and containment, much-reduced groundwater and water supplies from all sources, population density increases, regulatory requirements, etc etc.

Ind 823-6

It would seem that our city council has swallowed this "opportunity" and directed an EIR to be made to legitimize the IMgone project. The IMgone EIR reads like a high school report, liberally sprinkling general policy and motherhood statements from various public agencies, drawing sweeping economic issues under the "volunteer cleanup" action, playing a corporate entity separation game to disable chain of liability to get under regulatory controls and the most egregious violation is the absence of any real cost analysis for any of the worst-case scenarios that must be addressed.

Ind 823-7

To be fair, to even think for one second that an EIR will or even can address all of the issues is absurd. The attempt, if not such a serious breach of public trust and threat to the community, would otherwise be laughable. This entire IMgone business scheme for a few "high paying" community jobs? Absurd. See above the potential damages and costs. They are insurmountable as they are permanent. Workers are hired and fired without recourse. What body of authority can seriously claim that this mining resumption has some economic benefits over and above the costs? It has scam written all over it, any fool can see that. This is not rocket science, it is plain. The mines were no longer profitable 50+ years ago and at a time when hardly any of the true costs were addressed in the economics calculation. Today, we know the costs and they are magnitudes greater than they were.

Ind 823-8

In short, we would be sacrificing our water, land, air, community, way of life, ecological systems, and for what? Some gold for some stupid-money investors and con men? There isn't enough gold in the entire US that can pay for this potential Chernobyl and EPA superfund site. Explaining the IMgone EIR in terms of EL5, economically even cursory count fingers analysis would quickly show IMgone is a fraud and undercapitalized Rise Gold at best incompetent at rudimentary arithmetic and at worst a scam orders of magnitude larger than their Canadian precursor. The only jobs created by IMgone are the city and county government jobs to evaluate an investment con dressed up as a legitimate corporate mining enterprise. We the citizens will remember how our tax money was spent and how quickly our city leaders forget the gold mine reopening debacle in San Juan just a few miles north and a few years back. If it looks like a scam, smells like a scam, and quacks like a scam, it's probably a scam. To quote a Noble Prize winner, "you don't need a weatherman to know which what the wind blows", just like we don't need an EIR to know IMgone is a scam.

Ind 823-9

Sincerely,

Walt Froloff

516 Temby St.

Grass Valley, CA 95945

walt@patentalchemy.com

INDIVIDUAL LETTER 823: WALT FROLOFF (1)

Response to Comment Ind 823-1
The commenter expresses dislike of the project and states that it would only economically benefit the Project Applicant while causing harmful environmental impacts to the community. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The comment is noted for the decisionmakers but does not address the adequacy of the DEIR and does not warrant further response.

Response to Comment Ind 823-2
The commenter references the Project Applicant's CEO and his past business dealings in Canada. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility. The comment is noted for the decisionmakers but does not address the adequacy of the DEIR and does not warrant further response.

Response to Comment Ind 823-3
The commenter describes environmental damage caused by historic gold mining in California. The comment is noted for the decisionmakers. The commenter is referred to DEIR Chapter 4.8 Hydrology and Water Quality for a description of the existing water quality conditions in the project area and an evaluation of the proposed project's potential impacts on water quality. The comment does not address the adequacy of the DEIR and does not warrant further response.

Response to Comment Ind 823-4
The mine was closed in 1956 due to the fixed price of gold at $35 and high-cost inflation. The gold price currently trades on the free market. The commenter further describes historic gold mining operations. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The comment is noted for the decisionmakers but does not address the adequacy of the DEIR and does not warrant further response.

Response to Comment Ind 823-5
The commenter generally alludes to a variety of environmental impacts that should be considered. The DEIR addresses each of the issues listed in this comment in the appropriate sections (see DEIR Chapters 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; 4.7 Hazards and Hazardous Materials; 4.8 Hydrology and Water Quality; 4.9 Land Use and Population and Housing; and 4.13 Wildfire). The commenter does not provide any specific comments that address the adequacy of the DEIR, and no further comment is warranted.

Response to Comment Ind 823-6
The commenter takes issue with the adequacy of the DEIR but does not provide any specific details. The commenter refers to the "city council" while the land use authority for the project is the County. The commenter asks for analysis of worst-case scenarios; however, California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst case scenario." (see Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 373.). The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The comment is noted for the decisionmakers but does not provide any specific comments to which a response can be made.

Response to Comment Ind 823-7

The commenter asserts that the DEIR fails to address all of the possible impacts from the project, but does not specifically identify why the DEIR is inadequate. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The commenter's opposition to the project is noted for the decisionmakers.

Response to Comment Ind 823-8

The commenter generally states that the economic benefits would accrue to the Project Applicant while the community would suffer harmful environmental impacts. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. As a point of correction, the project would not be located on an EPA superfund site. The Centennial Site has never been on the National Priorities List[5] (A "Superfund site"). The Centennial Site has never been proposed to be placed on the National Priorities List (NPL). The USEPA has prepared a Site Inspection Report in 2019 for the Centennial site but did not score the site using the Hazard Ranking System (HRS). The HRS is the primary method used to place sites on the NPL[6].

The comment is noted for the decisionmakers but does not address the adequacy of the DEIR and does not warrant further response.

Response to Comment Ind 823-9

The commenter states that the only jobs created by the project would be government jobs and reiterates his general opposition to the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The comment is noted for the decisionmakers but does not address the adequacy of the DEIR and does not warrant further response.

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

Individual Letter 824

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MAR 08 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

March 1st, 2022

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

General Comments on the **I**daho-**M**aryland **G**oldmine **O**pportunity in **N**evada **E**nterprise, IMgone, project EIR

Even before reading the subject, EIR most will conclude that for the city planners to even consider reviving a mining project in Grass Valley is on its face strange and repugnant. Strange because to open such an ecologically, economically, community, culturally, and socially disruptive business tortures common sense. Repugnant because it makes no business logic from any position, save the one where proponents raise money, enrich themselves and then flee the country, leaving investors and the people of Grass Valley to clean up the enormous damage and irreparable harm.

Ind 824-1

This exact scenario played out on a much small scale, in Canada where Rise Gold first conceived this practice and was a dress rehearsal for IMgone. Just the act of a town council entertaining this predatory business practice substantially legitimizes a fraud parading around as a corporate mining business. A costly court cause of action for an injunction is looming, and not only on the EIR process but on Riser Gold as well. It is well known that Rise Gold is undercapitalized and that a common red flag for this kind of scheme. County money should be spent seriously investigating Riser Gold and the proponents of IMgone. Where are the hundreds of $millions to re-open Chernobyl going to come from and the $Billions to close Pandora's box once re-opened?

Perhaps the city council should take a field trip to any of the public gold mine parks for a look into the past. Historically the gold mining operations in Nevada County controlled and affected everything and everyone in the community, which served the mine mostly to enrich a few owners. Nothing wrong with that, it's the capitalist way. But look what was done to the environment, the permanent damage to the rivers and streams, to fish, wildlife, and humans which now must live with mercury poisoning and other toxins.

Keep in mind that this happened when the community, environment, and ecology were pristine and regulations were non-existent. Despite the enormity of the damage, the mines were closed down years ago because they became unprofitable. That was when the costs were only considered for the owner's profitability, not the true costs including contaminated soil and water, economic, health, social, cultural, and ecological which have increased several orders of magnitude. Back then you could just take the money and run.

But today one needs to consider issues such as large regional wildfires burning toxic materials used and stored at the mine, climate changes creating challenges to energy uses and power outages, fire ignition and control, mass population evacuations, contaminated wells, and surface waters, hazardous waste disposal, toxicity to the environment and containment, much-reduced

groundwater and water supplies from all sources, population density increases, regulatory requirements, etc etc.

It would seem that our city council has swallowed this "opportunity" and directed an EIR to be made to legitimize the IMgone project. The IMgone EIR reads like a high school report, liberally sprinkling general policy and motherhood statements from various public agencies, drawing sweeping economic issues under the "volunteer cleanup" action, playing a corporate entity separation game to disable chain of liability to get under regulatory controls and the most egregious violation is the absence of any real cost analysis for any of the worst-case scenarios that must be addressed.

To be fair, to even think for one second that an EIR will or even can address all of the issues is absurd. The attempt, if not such a serious breach of public trust and threat to the community, would otherwise be laughable. This entire IMgone business scheme for a few "high paying" community jobs? Absurd. See above the potential damages and costs. They are insurmountable as they are permanent. Workers are hired and fired without recourse. What body of authority can seriously claim that this mining resumption has some economic benefits over and above the costs? It has scam written all over it, any fool can see that. This is not rocket science, it is plain. The mines were no longer profitable 50+ years ago and at a time when hardly any of the true costs were addressed in the economics calculation. Today, we know the costs and they are magnitudes greater than they were.

In short, we would be sacrificing our water, land, air, community, way of life, ecological systems, and for what? Some gold for some stupid-money investors and con men? There isn't enough gold in the entire US that can pay for this potential Chernobyl and EPA superfund site. Explaining the IMgone EIR in terms of EL5, economically even cursory count fingers analysis would quickly show IMgone is a fraud and undercapitalized Rise Gold at best incompetent at rudimentary arithmetic and at worst a scam orders of magnitude larger than their Canadian precursor. The only jobs created by IMgone are the city and county government jobs to evaluate an investment con dressed up as a legitimate corporate mining enterprise. We the citizens will remember how our tax money was spent and how quickly our city leaders forget the gold mine reopening debacle in San Juan just a few miles north and a few years back. If it looks like a scam, smells like a scam, and quacks like a scam, it's probably a scam. To quote a Noble Prize winner, "you don't need a weatherman to know which what the wind blows", just like we don't need an EIR to know IMgone is a scam.

Sincerely,

Walt Froloff
516 Temby St.
Grass Valley, CA 95945
walt@patentalchemy.com

INDIVIDUAL LETTER 824: WALT FROLOFF (2)

Response to Comment Ind 824-1

This letter is a duplicate copy of Individual Letter 823. Please see comments and responses in Individual Letter 823.

Individual Letter 825

From: Joan Staffen
To: Idaho MMEIR
Subject: Re: Comment on Re-Opening of Idaho-Maryland Mine by Rise Gold & EIR Report
Date: Monday, March 7, 2022 5:25:31 PM

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From: Walt Froloff

To: Matt Kelley, Senior Planner

General Comments on the Idaho-Maryland Goldmine Opportunity in Nevada Enterprise, IMgone, project EIR (Specific comments will follow later.)

Dear Matt,

Even before reading the subject, EIR most will conclude that for the city planners to even consider reviving a mining project in Grass Valley is on its face strange and repugnant. Strange because to open such an ecologically, economically, community, culturally, and socially disruptive business tortures common sense. Repugnant because it makes no business logic from any position, save the one where proponents raise money, enrich themselves and then flee the country, leaving investors and the people of Grass Valley to clean up the enormous damage and irreparable harm.

Ind 825-1

This exact scenario played out on a much small scale, in Canada where Rise Gold first conceived this practice and was a dress rehearsal for IMgone. Just the act of a town council entertaining this predatory business practice substantially legitimizes a fraud parading around as a corporate mining business. A costly court cause of action for an injunction is looming, and not only on the EIR process but on Riser Gold as well. It is well known that Rise Gold is undercapitalized and that a common red flag for this kind of scheme. County money should be spent seriously investigating Riser Gold and the proponents of IMgone. Where are the hundreds of $millions to re-open Chernobyl going to come from and the $Billions to close Pandora's box once re-opened?

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live with mercury poisoning and other toxins.

Keep in mind that this happened when the community, environment, and ecology were pristine and regulations were non-existent. Despite the enormity of the damage, the mines were closed down years ago because they became unprofitable. That was when the costs were only considered for the owner's profitability, not the true costs including contaminated soil and water, economic, health, social, cultural, and ecological which have increased several orders of magnitude. Back then you could just take the money and run.

But today one needs to consider issues such as large regional wildfires burning toxic materials used and stored at the mine, climate changes creating challenges to energy uses and power outages, fire ignition and control, mass population evacuations, contaminated wells, and surface waters, hazardous waste disposal, toxicity to the environment and containment, much-reduced groundwater and water supplies from all sources, population density increases, regulatory requirements, etc etc.

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Sincerely,

Walt Froloff

516 Temby St.

Grass Valley, CA 95945

walt@wxfman@gmail.com

INDIVIDUAL LETTER 825: WALT FROLOFF (3)

Response to Comment Ind 825-1

This letter is a duplicate copy of Individual Letter 823. Please see comments and responses in Individual Letter 823.

Individual Letter 826

From: Joan Staffen <joanrose1030@gmail.com>
Sent: Wednesday, March 2, 2022 5:04 PM
To: Idaho MMEIR
Subject: Re: Comment on Re-Opening of Idaho-Maryland Mine by Rise Gold & EIR Report

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Ind 826-1

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1

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Sincerely,

Walt Froloff

516 Temby St.

Grass Valley, CA 95945

walt@wxfman@gmail.com

INDIVIDUAL LETTER 826: WALT FROLOFF (4)

Response to Comment Ind 826-1

This letter is a duplicate copy of Individual Letter 823. Please see comments and responses in Individual Letter 823.

Individual Letter 827

Matt Kelley, Senior Planner

Nevada County Planning Department

950 Maidu Avenue, Suite 170

Nevada City, CA 95959-7902

March 23, 2022

email Idaho.MMEIR@co.nevada.ca.us

RE: Specific Comments on the Idaho-Maryland Goldmine SCH# 2020070378 Draft Environmental Impact Report - DEIR

Dear Mr. Kelley,

Ind 827-1

My name is Walt Froloff, and I am a new resident of Grass Valley. I moved here to enjoy the more rural setting and beauty of this area where the quality of life has been preserved up to this point. I was horrified to learn that the city/county authorities are even contemplating this death to a community project. This one project will kill the quality of life here. I don't believe that this DEIR covers this subject in sufficient depth or any understandable way. Some of the conclusions have no reality-based or common-sense conclusions. Some of the analyses, traffic, for example, present an analysis of trivial and unrealistic traffic impact models. For the cancer analysis, no real-world conservative dispersion models are presented and hence the conclusions are garbage, as in GIGO. Reality or realistic design basis scenarios are ignored mostly throughout this DEIR in most of the sections. Some definitions of terms need drastic changes as they are misrepresentative of the data that is provided or they are just insufficient to aid in understanding this catastrophe in the making. Please consider my comments on your DEIR. I would appreciate a response. Thank you.

Walt Froloff
516 Temby St,
Grass Valley, CA 95945

Please find my comments to the immediately preceding DEIR specific references enclosed in the /*WxF: :WxF*/ delimiters

Ind 827-2

Chap 1: page 1 -1CEQA Guidelines Section 15021, public agencies are charged with the duty to avoid or minimize environmental damage where feasible. The public agency must balance a variety of public objectives, including economic, environmental, and social issues.

/*WxF: Obligation to balance public objectives including economic etc appears to be the primary mandate for this EIR. There are shockingly no economics or cost numbers mentioned and therefore this DEIR can never fulfill this mandate because it is a grossly incomplete analysis. The public objectives are at first to do no harm to the community and environment. This is generally

shown in financial or economic terms. That means balancing the operation of a mining enterprise in Grass Valley without harming life, environment, or quality of life to the members and community. This report is void of all mitigating measure costs. The implication of mitigating measures as in an economic sense must be shown after and above the damage done to the community and environment from all impacts. Moreover in the subject DEIR the liability and burdened party in the analysis and conclusions are quickly swept under the "acceptable insignificant impacts" label and damages permitted or systematically erased as they have no real costs. These "mitigating measures" appear as general nice things to do. Re-opening a mining industry for a private company in return for some jobs and perpetual significant damage to the environment and surrounding community is **not** simply "unavoidable" and otherwise acceptable at any potentially lethal concentration. These freely given and incomplete "mitigating measures" do not make anything "less than significant". This DEIR "mitigates measures" seems to imply that this is a feasible enterprise, that all possible death or destruction is less than insignificant if the proponent does a few things. How is that even possible? What are the mitigating things to a murder?

This DEIR erroneously concludes that for a few more decibels of noise in a particular area that is greater than currently tolerated seems acceptable with some "mitigating measures". In law, this is called a public nuisance and it is litigable. As explained in engineering terms the noise is measured on a logarithmic scale which makes the numbers even more misleading from the onset. The damage is to people and life, in general, is called noise pollution and a few decibels at 10 times per decimal increase are not insignificant. So, to those engineers counting decibels it may be simple arithmetic, but to those living with the increase in noise, increase in toxins, increase in fish and wildlife death, increase in contamination, increase in traffic, increase in danger from trucks laden with toxic tailings and spreading toxic dust as they traverse the community, etc, these are not additive. But the reality is that all of these qualities of life reducers are synergistically combined and enormously detrimental but unaccounted for in the draft. One doesn't just add insignificant impacts like the cost of groceries for the week. All impacts, less than significant, average significance, somewhat significant, almost significant, annoyingly significant, significant, and unavoidably significant are synergistically combined multipliers of reduced quality of life, environmental, and social impacts. Moreover, the detriment to the quality of life is inflicted on the community in perpetuity, and for what? An unproven unsupported unsustainable short-term corporate profit at best or a scam at worst. :WxF*/

Chapter 2 – Executive Summary Page 2-2

Policy 17.9: Encourage the mining of previously mined land**, if such land still contains economically mineable minerals**, so the land can be reclaimed for alternative uses. As discussed above, this alternative delays how quickly the land can be reclaimed to a condition suitable for an "alternative use" of industrial by extending the construction of the industrial pads on both the Centennial and Brunswick Industrial Sites and extending the overall life of the project.

Ind 827-3

/WxF: "IF SUCH LAND STILL CONTAINS **ECONOMICALLY** MINABLE MINERALS" Since the mines were closed and abandoned because there were **not economically** minable minerals at the time, where environmental standards were non-existent, there can be little doubt that the proponent can NOT show that this has changed, even on paper which they have not done, ie this proposed project **is not economically** feasible and therefore on its face not

2

compliant with Policy 17.9. Has the economics of crushing thousands of tons of rock, extraction by toxic chemicals, recycling most of the toxins (which need only very low concentrations to threaten health), removing residual tainted rock dust by truck all the while polluting the roads and drivers with toxic dust in finding a stabilizing home for 1.6 million tons contaminated with cyanide, mercury gotten cheaper? Please remember that over time these all have gotten enormously more costly. And miraculously the price of gold has escalated faster than any of these previously not considered costs? These enormous costs and a few low-paying jobs, considering the true cost of damaging the environment further? The true cost of recovering from a superfund site at the costs shown as to be paid for all of the old sustained damage and from future damage to the environment? Again, is this truly "economically feasible" with all of the costs? And is there a still sufficient minable mineral to pay for the damage to life and limb, all of the costs listed and considered? It is **not**, or at least on from this DEIR or common sense. This entire phase of an EIR process was unnecessary on its face. The burden of proof is on the proponents to show that this EIR cost is justified, that mining for minerals is economic and it must be undertaken by credible proponents. None of these have been shown, and evidence exists and is common knowledge that the proponent of this project has unclean hands from a previous such project on a smaller scale in Canada. For whatever reason, the proponents of this evil project are treated as if they were a legitimate and successful mining entity capable, not just a noname corp with $2 million that purchased an abandoned gold mine. That's not even the cost of two homes in Nevada County. Can two homeowners that sell their property now afford to re-open a mining business? Does this make any sense? :WxF/

Policy 17.10: Consider the socio-economic impacts associated with proposed mining operations. As discussed below, extending the life of the **project affects the economics and ability to finance the project which may impact the implementation of this project including the number of jobs, sales, property, payroll taxes, and land value.**

/WxF: This DEIR is grossly in violation of Policy 17.10, as the "**economics and ability to finance** the project" are not included, and if they were we would not be here, this project would have been thrown out or exposed as a scam. Has the initial fixed cost including the mitigation measures, worst-case design, and emergency scenarios been accounted for, before even an ounce of gold is mined, repairing the environmental damage existing and building the necessary facilities for safe mining, sufficiently funded by the proponent corporation? Or is this going to be another San Juan mining corporate business scheme to sell stock and then abandon stockholders left holding worthless stock when the corporate executive team abandons with their planned exit strategy, with the money raised? Show me the money, show me some realistic requisite costs that will be financed and sustained by a solvent corporation with sufficient insurance for all the failures and damage. This as opposed the most probable outcome to defaulting and bankrupt corporations leaving a giant wholly mess for the taxpayers to clean up. How is this project even remotely feasible under Policy 17.10? Where is the insurance cost for failure to clean up the mess reopened? Can they even be insured?: WxF/

Ind 827-4

Chapter 1 – Introduction Page 1-4

Ind 827-5

3

In 2005, the Environmental Protection Agency ("EPA") identified the Centennial Industrial Site as potentially needing some level of environmental remediation due to historic mining operations that occurred before Rise's ownership of the site, and in 2018, the EPA confirmed that environmental remediation was necessary.

Rise Grass Valley Inc. entered into a Voluntary Cleanup Agreement (VCA; Docket No. HSA-FY18/19-014) with the Department of Toxic Substances Control (DTSC) for the voluntary cleanup of soil contamination on the Centennial Industrial Site.

/WxF: Rise has a conflict of interest in "Voluntary Cleanup". "Voluntary" is not free but implies such in all the hoopla. The fox brought in a friend fox who just volunteered to watch the hen house. Does that seem reasonable? When did we start allowing corporations to self-regulate in the Environmental arena? Why are these "volunteers" not afraid of handling toxic tailings? With all due respect, this is one of the stupidest ideas proposed here. Who is to dictate when cleanup is safe? What happens if the "volunteers" decide to quit? How does a profitable corporation stay solvent by employing "volunteers" for hazardous duties and why aren't these costs part of the economics equation? Where are the cost estimates for all the work required, and not just the "mitigation measures"? After all, this analysis has to show that the proponent can "economically mine minerals". Where are the monitoring agencies going to get funding for all the monitoring and compliance work that they will be doing for those "jobs" and taxes to the community? Since Rise has deemed this a viable investment opportunity, perhaps they are not truly worried about the costs. This can all be an investments scam made to raise money for the corporate owners. The inherent conflict of interest for "volunteering" will dictate when the "cleanup" is sufficient. If the owner's exit strategy is to abandon ship just like they did in their Canada mining enterprise, who will have the burden of cleanup? How does one use the law to extend to the country that they funnel money to and flee to avoid consequences when their corporation defaults? :WxF/

Extensive site investigation, overseen by DTSC, has **identified mill tailings**, waste rock, and affected soil at the site that contain **lead, arsenic, mercury, and other metals at concentrations exceeding** background soil metals concentrations and regulatory benchmark concentrations. Elevated soil metals concentrations present a potential human health risk resulting from routine, long-term exposures, as well as ecological concerns in terms of impacts to plant and animal species

/WxF: The Rise "volunteer" program is a sham and did not solve the problem. The analyis reveals that the lead, arsenic, mercury, and other metals at concentrations exceeding gov't allowable limits are some of the deadliest and hardest to contain even after the "scrubbing" and trucking them to another location introduces all kinds of new and bigger problems, none of which are addressed or costs estimated. These are a greater hazard to health and safety to humans than radioactive waste, as these do not ever decay, but stay deadly forever. Left to the winds of time and space these will no doubt find their way to innocent people in the future. Where are the assurances/expert analysis/science that they will not be released from this "enterprise"?:WxF/

Chapter 1 – IntroductionPage 1-5

Ind 827-6

Stabilization includes **mixing Portland cement with hot spot contaminated soils** in the designated consolidation area to prevent potential water quality impacts

/*WxF: How does Portland cement contaminant remain stabilized with leaching surface and groundwater over decades, especially when the cement forms cracks and crumbles in time and weather? Cyanide, Mercury, and other toxins do not have a half-life. That is once released the toxins remain forever active, an infinite half-life. Can this ever-present danger to surrounding wells and the public be contained or is this time bomb of wishful thinking eventually turn into a contaminated superfund site? How is Rise going to "stabilize" the remaining 1.6 million tons of contaminated soil and where are the funds to cover this one single aspect of this "project"?How are investors going to know that they are not signing up into a scam with all of your "alternatives" representative of hypothetical models and not reality? :WxF*/

Chapter 2 – Executive Summary - Page 2-9

Table 2-1 Summary of Impacts and Mitigation Measures

Impact, Level of Significance, Mitigation Measures, Level of Significance after Mitigation Measures

LS = *Less Than Significant*; LCC = *Less Than Cumulatively Considerable*; S = *Significant*; CC = *Cumulatively Considerable*; SU = *Significant and Unavoidable*

Mitigation measures must be implemented as part of the proposed project to reduce potential adverse impacts to a less-than-significant level, when feasible.

Ind 827-7

Impacts that are determined to be significant in Chapters 4.1 through 4.13, and for which feasible mitigation measures are not available to reduce those impacts to a less-than-significant level are deemed Significant and Unavoidable, SU. If the decision-making body elects to proceed with a project that would have significant unavoidable impacts, then a Statement of Overriding Considerations explaining the decision to balance the benefits of the project against unavoidable environmental impacts must also be adopted. significant and unavoidable impacts and significant irreversible changes to the environment must be addressed.

/*WxF: Impact, Level of Significance, Mitigation Measures, Level of Significance after Mitigation Measures.

Less than significant impacts, LS, implies less than significance in an expert's judgment or average standard. This is not the same as insignificant impacts, but the implication is made that it is insignificant and impact and therefore allowable. In addition, the magnitude of these less than significant impacts is only a judgment and it implies that there are no costs associated with this characterization of impacts. There are many issues here that will be deemed LS. The costs and judgments should be taken from the community protection position and not a neutral or business encouragement position. This is about the greater good, where the needs of the many outweigh the needs of the few wealthy. Let's face it, this mine re-opening is never going to be about meeting the needs of the many because historically this mine has only served the needs of the few seeking financial profits at the expense of the public commons and by the wealthy corp. investors who have the wherewithal to finance and hoist this tragedy on generally the gullible public that has unscrupulous or corrupt gatekeepers on watch...

Typically jobs are the big carrot used by these investors seeking to leverage the public trust and the public commons. The kinds of jobs the mining industry offers historically by today's standards were jobs taken under duress and fraught with great peril to the health and safety of individual workers. This is not the practice or standard for today's jobs. While the cost of jobs in the mine went from $3/day to theoretically today's conservative project offered $400/day, this does not scale up with the cost of living, inflation, taxes, and healthcare expenses from the $3/day. That $3/day allowed a miner to purchase a house and support a family. It is impossible to do the same on $400/day with today's cost of living. So jobs are not even a good carrot or incentive for this community.

Ind 827-8

Then there are the confused conclusions for some of these LS impacts. For example in *Chapter 4.10 – Page 4.10-6* we find under Conclusion, "However, the project-generated truck traffic would remain constant, and would not increase over time. **As a result, the incremental contribution to overall traffic noise levels resulting from the project would decrease over time.**"There is no way in hell that after absorbing all of the information given on just the vibration and noise topic alone, that would lead a non-biased party to make this kind of conclusion, "noise levels resulting would decrease over time". Therefore it makes this entire section suspect for accuracy of data and integrity of conclusion. It is conclusions like this that destroy the authors' credibility on "less than significant" analysis, and the DEIR's validity of findings in general.

Ind 827-9

The real and major scenarios necessary for predicting traffic impacts from the proposed mining industry re-opening are as follows: Picture yourself driving into town on your relatively peaceful and beauty-filled scenic winding country road. It's always been a pleasure to come into town and you do it every day. All of a sudden you encounter a slow but safe moving very large truck carrying 30 tons of toxic dust and small rocks. The truck bed is bouncing stones onto your windshield and nice car paint job, the dust from the truck bed has continuously overtaken you and that is what you are breathing as you proceed into town. Soon other cars start to pile up, as the truck must travel safely on the narrow winding 1 lane mountain road. Your thoughts have now been changed from the old ambient beauty around you to the stink of diesel and toxic dust the envelope you and the several others behind and in front of you. You are now just part of a slug of traffic going at a reasonably slower rate so that the toxic dump truck in front of you and others can arrive into town safely. That would be thought successful if the truck brakes didn't give out or the turning twisty contortions that the truck had to thread did no damage to its suspension wheels or tires and you all arrived safely at the first intersection in town. Never mind that just those few minutes feel like an eternity and that you could not contain any of your original thoughts, you are now under tremendous stress, along with a slug of others trying to figure out how they can get around this f&^%$# truck in front of you. Now of course the new traffic engineers have engineered, "optimized" traffic so that a whole big slug of cars and the truck can now get through this light with just one green. Not likely but let's just say for mitigating measures' sake that it could happen. What are all the cross-traffic waiting cars going to feel when they get short-changed on the delay times? This stealing from Peter to pay Pay isn't going to be fair to them, is it? But in the DEIR, these are "mitigating measures" that will turn a "significant impact" into a "less than significant impact". Does that make any sense at all? Is the writer of this part of the DEIR even sentient?

Ind 827-10

If that wasn't enough, those impacts deemed LS does have costs all by themselves and are not insignificant and given unfair characterization as such. Less than significant is still part of the erosion of the quality of life overall to the community and evident in every town that has foolishly allowed this kind of destructive business to come in to save the economy. Moreover, these costs can be significant to individuals and health to impact and not necessarily the average.

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The Level and Alternatives approach taken results in individual numbers of increased cancers. While this approach is used elsewhere, it should be noted that even one life is significant and the cost of such infinite. The judgment is made in this DEIR is relative to a public agency standard which must balance the impacts across all parties involved. These agency standards are applied on a particular issue that has been identified and flagged for a case-by-case application with only that agency's field of authority or standards. The applier of these standards must use realistic and conservative models and not easy cherry-picking that is shown throughout this DEIR. Also, the impacts for a particular population when combined may be well above the LS limit, which is taken against one impact not all. For example, when taking into account "jobs for the community" we should note, that a job is interchangeable, a life is not. An individual must be allowed to choose life over a job. That is to say, if there are no safe jobs here in the community, it's still by far better that an individual find a job elsewhere, rather than taking a job here that will shorten his/her life. On a larger scale, this leads to degradation of the quality of life and property devaluation for the entire community. Check the economic impact of living in a small community with a nuclear facility and trucks transporting low-level waste through 111 trucks 24/7 and 365 days a year. Less than significant doesn't come up.

This brings us to Significant and Unavoidable, SU. There are several of these kinds of impacts that will affect individuals that do not in any way benefit from the gold mine operation. It only takes away from their quality of life, whether it added noise, added people traffic or added traffic road rage, higher commuter costs, added air bourn toxic dust from trucks on the roads or tailing, fire danger, well water depletion, water costs, and combinations of these impacts lost quality of life is the result. Multiplied over the individuals in such an affected group is what unfairness and injustice are all about. Good high-tech high-paying jobs are starting to come back, reopening the mine will only if at all, bring in a few low-tech jobs which the community will have to carry the burden in supporting.

:WxF*/

Chapter 2 – Executive Summary Page 2-7

Table 2 – 1 Summary of Impacts and Mitigation Measures

Impact – level of Significance Prior – Mitigation Measures – Level of Significance post Mitigation Measures

Ind 827-11

/WxF: General comment, there are 105 pages of Impacts and Mitigation Measures and **zero** on the economics or costs of such activities. There are thousands of very costly activities required here. The law is such that this endeavor must be economically feasible. But nowhere nowhere nowhere are there any economic cost estimates, material labor environmental social, or living costs. The very obvious conclusion is that there is not a possibility of a positive economically minable mineral outcome, all the alternatives are not just losers, save the one not to re-open for mining mineral, they are alternative deaths to a community. It strikes a reader that this is too odd, that there is no disinterested 3rd party looking into the economic feasibility even though that is the primary nexus to re-opening the mining industry here. The proponent Rise has something else in mind, and the damage costs do not dissuade them from pursuing this obvious boondoggle.

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At the end-of-the-day, the entire DEIR is to educate the public on the practicality and feasibility of this preposterous proposition. The public policy and laws show that this mine reopening is never going to be economic, and yet it is written here in such a way as to imply that all of these "mitigation measures" cost nothing and the proponents can completely manage the "significant impacts" referenced with "mitigating measures" to bring the potential impacts to "less than significant"

Furthermore, these are by no means entirely inclusive of the impacts or severity of the impacts. The "level of significance" before and post-mitigation are some experts' best guesstimate since there are no references to previous costs of doing exactly this mine. Where are the costs for all these WAGs? Why aren't they listed in the Summary of Impacts and Mitigations? These are significant impacts affecting proponents' project to be economic. It's as if Rise and proponents are not worried about the impacts and measure costs, even if they are astronomical. And nobody is watching for the public interest, as certainly this DEIR is grossly deficient in this one section 105 page Impacts and Measures table. Every single entry in this table is deficient and volumes can be had arguing the significance of the impacts, worst-case scenario and costs in $dollars, cost in lives and cost in environmental damage in perpetuity. :WxF/

Chapter 2 – Executive Summary Page 2-8

Example of a typical Measure and impacts –

4.13-2 Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

In conjunction with the submittal of Improvement Plans, the applicant shall submit a comprehensive Vegetation Management Plan, inclusive of the

Ind 827-12

Centennial and Brunswick Industrial Sites, for review and approval by the County Fire Marshall's Office. The applicant shall implement all provisions of the Vegetation Management Plan during the project construction, operations, and reclamation activities. The Vegetation Management Plan shall include but not be limited to:

description of existing vegetative fuel sources;
description of vegetation removal during initial construction and inventory of equipment to be used;

- *requirement that exhausts of all equipment powered by gasoline, diesel, or other hydrocarbon fuel shall be equipped with effective spark arrestors designed to*

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Motor trucks, truck tractors, and passenger vehicles shall not be subject to this provision if their exhaust systems are

- *the requirement that all welding rigs shall be*
- *equipped with a minimum of one 20*
- *description of proposed landscape planting*
- *description and graphical presentation of defensible space zones;*
- *long-term maintenance schedule and safety*
    - *Removal of fire-prone fuels and dead material.*
    - *Removal of branches beneath large trees.*
    - *Maintenance of live plants, bushes, shrubs, and trees.*
    - *Removal of needles and leaves and*
    - *Annual grasses and forbs shall be cut down to a maximum height of four inches within 100 feet of structures and on engineered fill slopes.*
    - *Trimming of vegetation within specified horizontal distances from roadways and overhead power line(s), the latter of which may be implemented by PG&E as the service provider, consistent with clearance requirements in PRC Sections 4292 and 4293.*
    - *Seasonal removal of all dead and dying vegetation to reduce vegetation volume and ladder fuels.*
    - *Coordination with adjacent property owners, as applicable, to maintain tree canopies, vegetation, and ladder fuels on an annual basis.*
    - *Horizontal and vertical spacing among shrubs and trees shall be created using the "Fuel Separation" method, the "Continuous Tree Canopy" method, or a combination of both to achievedefensible space clearance*
    - *requirements. Spacing shall be done in accordance with the State Board of Forestry and Fire Protection's "General Guidelines for Creating Defensible Space, February 8, 2006,".*

/WxF: These mitigation measures are very precise but how is this precision going to be applied in the 80 years to come? Are these even the governing models to use? Moreover, the mitigation measures are not going to be free. This is just one "impact" in the table with 1000s more of

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activities, agencies, components, and management that must come together synchronously and in concert to complete these mitigation measures. Where the insurance that proponent will over that will be is accomplished 100% to the satisfaction of all regulatory bodies? Who is going to pay for the doing and monitoring? What is the cost for each activity? What is the degree of mitigation? Who sets the criteria for safety and overtime? It is glaringly obvious to anybody that has gone to a hardware store or had some home repair work done that these "mitigation measures" are going to add up to $100s million. Just the estimates will cost $millions. Who pays? Is the public paying these costs? The few occupational hazard jobs spawned by this project *will not even cover the health insurance costs for those individuals. Cost estimates should be done by a* credible estimator of such activities before a release ofEIRand paid for by Rise or the proponents of this project. Anything less is a conflict of interest or inconsistent with the policies, environment, and business law in authority over these kinds of projects. Are all obviously-not-economic schemes and scams to be investigated by public money? This alone adds weight and credibility to the "investment", to imply that this is a credible and legitimate opportunity for investors is ludicrous. Yet that is happening with this DEIR and process. :WxF/

Chapter 3.0 – Project Description Page 3-20///

4.3-2 ***Asbestos Dust Mitigation Plan.***

Before the initiation of any clearing, grading, or construction activities, Rise Grass Valley Inc. shall submit an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The provisions of the ADMP shall be initiated at the beginning of the project (before clearing or grubbing) and maintained for the duration of the project. The Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (Title 17 of the California Code of Regulations [CCR] Section 93105) contains specific requirements for the preparation of an ADMP. Conditions of the ADMP shall include the following:

Ind 827-13

/WxF: This section goes on for several pages. All manner of regulations are thrown in for good measure, but what is the approximate cost of each to the population, to workers, to neighbors, to the clueless investors and Rise are unknown. From Rise, from *NSAQMD,* for *gravel pad and maintenance, for Applying chemical dust suppressants or chemical stabilizers, For installing wind barriers, enforcing vehicle speed on all unpaved parts of the project sites, For all earthmoving activities, etc, etc.* Again, how is this mine going to turn a profit and make "mining minerals" economic? These costs aren't something a "volunteer" is going to absorb away and there are many more examples of these glaring deficiencies. See Table 4.3-7 Project Related Health Risks which are grossly understated. Calculations were made for a sunny uneventful day where there were no errors, no mismanagement, no unwatchful inadvertent, negligent or reckless behavior, accidents, or unfortunate by regular/routine acts of nature. Where are the worst-case scenarios? Those shown and used here are not designed basis criteria, these are hopeful nothing goes wrong with standard procedure calculation with no place in an EIR. This is not the way to measure and to plan for, where all only standard normal routine processes and calculations for such are made. "Significant Impacts" are relatively insignificant for normal operational plans. Significant Impacts happen when more than one thing goes desperately awry. No project like this is designed for 80 years of perfect nothing can go wrong with mining-related activity, fault activity,

flooding, and all manner of random acts of god and nature. Hence the need for some extreme scenarios, not the mundane day-to-day operations scenarios. How about a simple traffic scenario: a loaded truck, one of 111 per day, having bad brakes with affected soil en route that contain **lead, arsenic, mercury, asbestos, and other metals at concentrations exceeding** background soil metals concentrations having an accident, where many people are involved in a typical truck accident? What are the costs to humans, to property, and the environment before, during, and after the cleanup? :WxF/

Chapter 4.3 – Air Quality, Greenhouse Gas Emissions, and Energy Page 4.3-8

Diesel Particulate Matter

Diesel particulate matter (DPM) is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90 percent of DPM is less than 1 micrometer in diameter (about 1/70th the diameter of a human hair), and this is a subset of PM2.5. ….. diesel engines, including locomotives, marine vessels, heavy-duty construction equipment, stationary diesel backup generators, among others. Approximately 70 percent of all airborne cancer risks in California is associated with DPM.

Ind 827-14

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

To assess the health risk impacts of the project's construction and operational activities on proximate off-site sensitive receptors, a dispersion modeling analysis was conducted for the HRA of DPM emitted from diesel vehicles and off-road equipment, blasting emissions, and TACs from fugitive dust sources on the project sites.

/WxF: To assess the health risk impact of a project's construction and operational activities one must first apply some common sense on how and where there is likely to be some health impacts. Of all the verbiage served up here, the only thing they got right was the mission to find "fugitive dust sources" but the model and hence analysis conclusion is nonsense, a high school quality lots of rules and regulations but nothing to aid in understanding true impacts. So let's paint a picture as to where and how "fugitive dust sources" would happen. Let's just say you are an ordinary community member going to work or home, and you get stuck following one of these behemoth 30-ton trucks transporting the toxic dust from point A to point B. Keep in mind that these are one-lane mountain roads, and you just got unlucky, and there are 5 other cars ahead of you slowed down by and going at a safe monster truck speed laden with the toxic dust payload. If you are lucky, the rocks aren't cracking your windshield and denting, and damaging your vehicle. But that's not even the big issue. **The 30-ton toxic dust and rock-laden truck payload**

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rumbling down the mountain spewing toxic dust in the air (in all kinds of ppm sizes) in front of you and all of the other drivers slowed to the agonizing safe truck speed. You are breathing this all in. The cancers will be there and you will eventually die from any one of these trips. If you don't get cancer from breathing in that toxic dust from routine trucking distribution of toxic dust then you may be unlucky enough to be involved in a truck accident on this same mountain road. After all, there will be 111 trucks a day every day for 80 years, and trucks, statistically speaking, account for a disproportionately large percentage of mountain road accidents. Whereby the truck spills its payload all over the one-lane mountain road causing a complete blockage to traffic and safety, and you are unlucky enough to be one of them, let's just say for a typical scenario that 7 other cars are involved. The police and first responders come and they are unaware of the toxic dust and perform their duty. So now they are also victimized by the Rise Gold Corporation, which was allowed to perpetuate this travesty so that they could make a few bucks and we the community got a few jobs? These kinds of scenarios are the most likely to happen, not some ridiculous diesel engine emission dispersion analyzed, a misdirection the true impacts, and a lethal Faustian bargain for the community. And it's not even a good Faustian bargain as there is not even a reasonable short-term gain to the community for the long-term horror to plague innocent law-abiding citizens. The community is shafted from the onset, no pun intended. Increased from airborne cancer, intolerable truck traffic on narrow mountain roads, increased accidents on the road from 30-ton trucks, increased wait times delays for small trips for necessities, dramatically reduced quality of life from all of the combination of essentially life's mine re-opening destructors, etc. To somehow conclude that this is a beneficial business for the community is insanity. This complete abortion of dispersion and traffic models is not going to help decision-makers understand what is going on with this mine reopening, as the models and scenarios are cherry-picked to give the answers that give this corruption legs and seem somewhat reasonable to somebody that does not understand science or technology or the correct application of the multiple government agency rules and regulations. :WxF*/

4.3-81 Because asbestos was found to be present in some of the underground mining material samples that Rise Grass Valley Inc. sent for laboratory analysis,[41] an ADMP is required to be implemented to reduce potential asbestos exposure and protect public health.

Ind 827-15

/*WxF: The "reduce potential asbestos exposure" allows the EIR to use lower concentrations. In a perfect world run by saints, this may be a feasible approach. But this is not an "arms-length" relationship approach nor a worst-case scenario to use the lesser everything is going according to Hoyle concentrations and the higher asbestos source concentrations should be used in all of the exposure calculations, not the 'mitigated" concentrations. This changes the risks to more realistic exposures as the exact location of all asbestos in the mine is only partially known. :WxF*/

Chapter 4.12 – Transportation Page 4.12-8

Level of Service versus Vehicle Miles Traveled

Pursuant to the CEQA Guidelines Section 15064.3, vehicle miles traveled (VMT) is the primary metric used to identify transportation impacts under CEQA. VMT is a measure of the total amount of vehicle travel occurring on a given roadway system. However, because the County considers vehicle level of service (LOS) as a matter of General Plan policy consistency (specifically related to Nevada County General Plan Policy LU-4.1-1 and Policy LU-4.1.2), LOS at the study intersections and roadway facilities is presented and analyzed herein for determining General Plan consistency.

Ind 827-16

/WxF: Thus the best-laid plans of mice and men have fowled the General Plan through smoke and mirror misdirection. The cancer potential damage dispersion has been eliminated through "General Plan consistency" conveniently. The greatest cancer risk will come from the 111+/day trucks burdened with 30 tons of toxic dust spewed into the air on traffic as they lumber their way down the 1 lane mountain roads. Picture yourself in one of 10 cars trailing one of these never-ending and constant behemoths trucks down the narrow windy mountain road while the speed and wind play havoc with their toxic cargo This scenario is amazingly not covered as significant impacts, not just for the havoc on the road, accidents spilling toxic dust on the road, road closures, expensive cleanups, cancers to responders and workers, cancers to the delayed and then there are the real traffic problems which are "unavoidable". The conclusions reached here are nonsense it is just GIGO, garbage in garbage out. :WxF*/

Chapter 4.4 – Biological Resources Page 4.4-87

Conclusion

Based on the above, implementation of the proposed project at the Centennial Industrial Site and Brunswick Industrial Site, and East Bennett ROWs could have a substantial adverse effect on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on State or Federally protected aquatic resources (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means. Thus, a ***significant*** impact could occur.

Ind 827-17

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

/*WxF: Tracking this Mitigation Measures(s) section for many pages is a litany of actions that must be taken to maintain impacts to "less-than-significant. This approach is used throughout the report. These measures are by no means insignificant in costs. One doesn't need to be a cost estimator to understand that these costs of mitigation are insurmountable in cost and monitoring. Moreover, there are many sections of "significant impact" throughout this report. The litany of

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requisite mitigation measure costs for all of these are astronomically large and by far prohibitive to economic mining. :WxF*/

Pg 4.6-5 As noted therein, Rise Grass Valley Inc. entered into a Voluntary Cleanup Agreement (VCA; Docket No. HSA-FY18/19-014) with the Department of Toxic Substances Control (DTSC) for the voluntary cleanup of soil contamination on the Centennial Industrial Site.

Ind 827-18

/WxF: Does DTSC ever refuse a "voluntary cleanup" from anyone? If I were to "volunteer" to clean up my backyard, would DTSC stop me? Are there any teeth to this voluntary declaration? Is there any legal/social/environmental liability to Rise? What happens if Rise RAP just sends a homeless derelict volunteer over to the site to take a look and he says "it looks clean to me".

Or worse, RISE sells a few $100 million in stock based on this "plan" and leaves the country? Who is going to chase the Rise CEO down the road in another jurisdiction, where he is free to perpetuate this scheme again? Fraud is a criminal offense and such an unprofitable enterprise opportunity for stock sales smacks of fraud. :WxF/

Chapter 4.6 – Geology, Soils, and Mineral Resources Page 4.6-23

Ind 827-19

/WxF: This chapter reads policy after policy, tool after tool, procedure, and response, but nothing real is presented. There is no analysis of financial impacts on proponents. How do all of these policies, tools, requisite actions affect the subject project? If they were truly applied, what would the costs be, and to whom? How many and what earthquake fault lines run through the property? What are the ramifications of explosions in the mines, mining activity, have on these and nearby land? There is some talk about Surface Mining Permits, all well and good, but what are they and do property owners on the surface have rights to negate this nuisance? We can talk about a project to split the earth into two equal parts. But shouldn't we first consider the costs of so doing, mitigating measures notwithstanding? The gold mining, economic mining of minerals, was done in Grass Valley that happened ages ago when there were very few people and investors controlled every aspect of the business to the detriment of everybody else. Times have changed, there are lots of people here now, duh, and they don't want their homes and property waterless, contaminated, and devalued. There is only talk about "adverse impacts", but is there anything in the EIR that considers the devaluation of property, public and private, from this boondoggle and it would appear an implication the public is responsible for all of the impacts, in the monitoring of nothing else. The people would have to monitor these activities, and why should the people bear the cost of a private company? A private company cannot monitor itself, history tells us that's folly. :WxF/

Ind 827-20

*Page 4.6-32*While the analysis shows that an active fault likely does not exist, out of an abundance of caution, the County has concluded that a ***significant*** impact could occur concerning exposing people or structures to the risk of loss, injury, or death involving rupture of an earthquake fault, strong ground shaking, ground failure, liquefaction, or landslides.

Mitigation Measure(s) Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

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/WxF: Again, what are the potential costs, and who is to bear them? Are Riser capitalized to the level required and insured to handle all of the mitigation measure costs? How much would just the insurance for covering all of these impacts cost? Where are the economics here? Can I just buy some abandoned mine property and declare my intent to mine for gold and look for investors? Is it that easy? And the county jumps for joy at this opportunity to devastate the community without some investigation of a disreputable corporation without the financial resources to carry through all of the costs associated with such a business? Intent to make a profit by Riser is not evident here. So we can only conclude that there exists a more nefarious exit plan by the proponents. :WxF/

Page 4.6-39 **Conclusion**

The proposed project would involve grading and construction activities at the Centennial and Brunswick Industrial Sites, as well as along East Bennett Road for the installation of the potable water supply pipeline. During construction and engineered fill placement at the Centennial and Brunswick Industrial Sites, topsoils would be disturbed and stockpiled and could be subject to an increased potential for erosion and loss of topsoil. Without the implementation of the mitigation measures in the Steep Slope and High Erosion Potential Management Plans, the proposed project could have a ***significant*** impact related to substantial soil erosion or the loss of topsoil.

Ind 827-21

/WxF: Where is the economic analysis in the "significant impact"? Is this a "significant impact" to a small part of a large part of this operation? Where does "maximally exposed individual" come from in the tables, a nice day every day for 80 years, or some real worst-case scenario for "maximally exposed individual"? Where does the max dose from asbestos come from? Have all of the asbestos sources from and around the mine been identified to a believable level or is a number from a table assigned and all calculations based on that? The fine print states that these sources "incorporates measures designed to minimize asbestos in engineered fill produced by the project, as well as asbestos fibers generated from underground mining from exhausting to the surface" This is not worst-case scenario calculations.

The title says Project Related Health Risks Again, how is this mine re-opening ever going to be "profitable"? Profitability and economic viability are not even remotely possible by even the most permissive standards of 100 years ago. So again, the primary legal nexus for any of this demands the "economics" of viability to profits and profitability. None has been shown and quite the opposite, the sunny-day scenarios and numbers used smack of biased analysis, legitimizes the Rise scam while presenting great potential harm to the Grass Valley community. :WxF/

Chapter 4.4 – Biological Resources Page 4.4-3

Ind 827-22

The excavation areas would be backfilled and regraded with clean fill to promote drainage, and erosion controls will be installed. The engineered fill pad would be graded so that runoff would drain away from the fill slope into surface and subsurface drainage controls. Following completion of the excavation, stabilization, and placement activities, disturbed areas will be

hydro seeded or broadcast seeded with an erosion-control native seed mix to reduce erosion and maintain fill slope stability.

/WxF: Where is the "clean fill" coming from and what are the costs of this continuous process? "Stabilized" for how long? What is the cost of all of these "drainage controls"? Released toxins last forever. How is are these "controls" monitored and managed over the time of danger, ie while people live and the population increases? The Federal Government doesn't even have a handle on this issue, just ask the DOE/NRC, so why are we allowing a hit-and-run corporation "volunteer" to solve this problem? :WxF/

Chapter 4-7 – Page 4.7-4

Former mining activities (predominantly lode gold mining) at the Brunswick Industrial Site included the Union Hill Mine and the Brunswick Mine. ….. Following its closure, the 20-stamp mill was moved offsite to another mine. The Union Hill Mine was not reopened.

Ind 827-23

/WxF: Q: It closed and not reopened because it was uneconomic to do so, and the environmental laws were non-existent impediments to economics. How is it possible that it would be "economic" to do so now when it wasn't before all the environmental damage costs existed? Where are the economics to show that it is even remotely profitable after the damage to the environment and community? How is this not a gross violation of Policy 17.9, and not even remotely likely that this will be "economic" for a few proponents of an investment opportunity and potentially officials that stand to profit in the future? Certainly, a few jobs are not going to "balance" the potential damage. :WxF/

Chapter 4-7, Page 4.7-10

Historic Storage of Chemicals: Records indicate that chemicals were historically stored at the Brunswick Mine. A warehouse inventory circa 1940 listed gasoline, butane, aviation fuels, kerosene, motor oils, drilling oils, bituminous road oil, copper sulfate, cresylic acid, cyanide, quicksilver mercury, zinc dust, and sulfuric acid. in the event of a wildfire, fire agencies will set up an incident command center, from which the fire agencies will notify the Sheriff's Office.

Ind 827-24

/WxF: A UN report warns climate change could spur 50% more wildfires by 2100. In the event of a fire, which is much more likely today due to climate change, topography, population, traffic routes, etc will be astronomically more costly and lethal on populations than just a fire, as the air particulate will contain many more lethal chemicals and toxins from the storage of chemicals needed for mining, and even much small quantizes taken in a lung will have much more severe health hazards. A fire at the mine is not just a "fire danger", it's Chernobyl. Where are the insurance costs to cover that? Why is climate change not addressed in any practical worst-case scenario? :WxF/

Chapter 4-7, Page 4.7-17

The handling and storage of hazardous materials are regulated by Chapter 6.95 of the California Health and Safety Code. Under Sections 25500–25543.3, facilities handling hazardous materials are required to prepare a Hazardous Materials Business Plan…..provides information on the potential impact zone of a worst-case release, and requires plans and programs designed to minimize the probability of a release and mitigate potential impacts.

Ind 827-25

/WxF: Shouldn't a public agency be looking at these requisite plans and programs for economic feasibility before anybody can decide anything? The worst-case release scenario is a very likely forest fire coming through the region, a very likely possibility with the state of our forests and climate change, and vaporizes the stored hazardous materials, gasoline, butane, aviation fuels, kerosene, motor oils, drilling oils, bituminous road oil, copper sulfate, cresylic acid, cyanide, quicksilver mercury, zinc dust, and sulfuric acid, making them airborne, now the predicted air particulate concentrations contain toxic substances that were not accounted for with just a forest fire. "staying indoors" may not be an option as even tiny quantities of airborne cresylic acid, cyanide, quicksilver mercury, zinc dust, and sulfuric acid will synergize into a Chernobyl situation, with the toxins having infinite half-lives, that is people can never go back home without a clear and present danger to their life and health. :WxF/

Chapter 4.10 – Page 4.10-17

However, the project-generated truck traffic would remain constant, and would not increase over time. **As a result, the incremental contribution to overall traffic noise levels resulting from the project would decrease over time**.

Ind 827-26

/*WxF: Then there are the confused conclusions for some of these LS impacts. For example in *Chapter 4.10 – Page 4.10-17* we find under Conclusion, There is no way in hell that after absorbing all of the information given on just the vibration and noise topic alone, that would lead a non-biased party to make this kind of conclusion, "noise levels resulting would decrease over time". Therefore it makes this entire section suspect for accuracy of data and integrity of conclusion. It is conclusions like this that destroy the authors' credibility on "less than significant" analysis, and the DEIR's validity of findings in general: WxF*/

Chapter 5 – Statutorily Required SectionsPage 5-17

The proposed project also includes the installation of a potable water supply line in E. Bennett Road to deliver Nevada Irrigation District (NID) potable water to existing residents whose wells may be impacted by the proposed project.

Ind 827-27

/*WxF: There is the assumption here that potable water is the only water that will be taken from adjacent landowners by the project and that existing residents with wells do not use the well water for any other purpose other than potability. If other purposes of water use exist and depend on the impacted wells or will exist in the future, where are the mitigation measure and costs of so doing? Does the proposed potable

water supply line have the capacity to provide for all of the impacted owner's well water well needs currently and in the future? "WxF*/

Chapter 5 – Statutorily Required Sections Page 5-12

The EIR requires the implementation of Mitigation Measure 4.12-10 to re-time the intersection and improve operations and shorten the queue length.

Ind 827-28

/*WxF: The gross assumption here is that re-timing the intersection can improve traffic operations. This is furthermore debatable since there is an underlying accusation that the county currently has poorly timed intersections and less than competent traffic managers setting the timing delays.:WxF*/

Chapter 6 – Alternatives Analysis Page 6-42

Based on the preceding alternatives analysis, the No Project (No Build) Alternative would be the environmentally superior alternative. Under this Alternative, the mine would not be operated at the Brunswick Industrial Site, and as a result, engineered fill would not be hauled to the Centennial Industrial Site.

Ind 827-29

/*WxF: This is obvious before the DEIR was ever undertaken. What is missing are the costs for the bad alternatives or boondoggles :WxF*/

Alternative 2 would be considered the environmentally superior alternative. The main objectives of the project would be achieved with this alternative,….

Ind 827-30

/*WxF: "environmentally superior alternative" connotes that this very expensive and uneconomically feasible alternative is somehow economically feasible, and not subject to or in violation of the rules for reopening mines. Superior alternative to what? This is especially misrepresentative of the findings since the mitigating measures stated there require that the state of CALIFORNIA eminent domain take the riparian rights of the landowners having impacted well water and compensate with a substitute for all future water required by these landowners sourcing from NID essentially in perpetuity. This "measure" promotes infringing on regional landowner's riparian rights, a litigable matter and cannot be assured to give this alternative life and is certainly not deserving of the title of "superior alternative", as it may not even be a legal alternative. Also, it is much less inferior in every way. All of the alternatives having neighbor well water effects have potentially riparian right violations which render them not alternatives until a court deems so, and these "superior alternatives" should be so changed to read "potentially next least worse alternative" :WxF*/

/*WxF:

Ind 827-31

Conclusion

This DEIR is a seriously flawed piece of work. The primary directive to find and encourage profitable businesses is ignored. The models applied and scenarios used are just wrong. If this wasn't such a serious matter, the models used in the DEIR to predict future environmental and community damage are just bad jokes. Therefore, even the conclusions cannot be taken seriously.

18

My personal favorite is the conclusion in *Chapter 4.10 – Page 4.10-19*, "However, the project-generated truck traffic would remain constant, and would not increase over time. **As a result, the incremental contribution to overall traffic noise levels resulting from the project would decrease over time**.".There is no way in hell that after absorbing all of the information given on just the vibration and noise topic alone, that would lead a non-biased party to make this kind of conclusion, "noise levels resulting would decrease over time". **The only way that this conclusion can make any sense, this by analogy, is if one were to suffer a sharp knife stab to the heart, then one would over time relative to the heart not feel pain from a continuous blow torch to the groin.**

:WxF*/

19

INDIVIDUAL LETTER 827: WALT FROLOFF (5)

Response to Comment Ind 827-1
The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter asserts that the DEIR is inadequate, but does not provide specific examples. The commenter's specific comments are addressed in Responses to Comments Ind 827-2 through Ind 827-31. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 827-2
Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

The standards of significance for the noise analysis of the DEIR are provided in Section 4.10.3 of the DEIR.

Response to Comment Ind 827-3
The mine was closed in 1956 due to the fixed price of gold at $35 and high-cost inflation. The gold price currently trades on the free market.

The project does not propose to use mercury or cyanide, as clearly stated on page 3-25 of the Project Description chapter of the DEIR.

Please see Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.

As a point of correction, the project would not be located on an EPA superfund site. The Centennial Site has never been on the National Priorities List[7] (A "Superfund site"). The Centennial Site has never been proposed to be placed on the National Priorities List (NPL). The USEPA has prepared a Site Inspection Report in 2019 for the Centennial site but did not score the site using the Hazard Ranking System (HRS). The HRS is the primary method used to place sites on the NPL[8].

Response to Comment Ind 827-4
The commenter asserts that the project violates General Plan Policy 17.10, but the commenter conflates the General Plan's policy to consider the socio-economic impacts of the project with financial feasibility. General Plan Policy 17.10 does not require a financial analysis for proposed projects. Please see Master Response 2 - Social and Economic Impacts, and with regard to operator responsibility, see Master Response 3 - Operator Responsibility. Availability of insurance is not an environmental issue that requires analysis under CEQA.

Response to Comment Ind 827-5
Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Ind 827-6
Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

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

The proposed project is expected to produce mine waste with lower sulfide and metal content than those produced historically, and the historic mine waste has been determined to be Group C mining waste from which any discharge would be in compliance with the applicable water quality control plan, including water quality objectives other than turbidity. Please see Master Response 9 - Historical Mine Waste at Centennial Site.

Mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Quality Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d) and engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)). These requirements will ensure compliance with all applicable water quality standards. Please see Master Response 8 – Mine Waste Characterization.

Response to Comment Ind 827-7

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 827-8

Page 4.10-6 shows a figure of Noise and Vibration Measurements. The commenter is likely referring to page 4.10-60, which discusses a substantial permanent increase in ambient noise and/or vibration levels associated with the cumulative noise and vibration from all sources of the proposed project. As noted in the Noise and Vibration Analysis, future traffic volumes on the project area roadways would increase over time relative to existing levels due to general growth of the region. However, the project-generated truck traffic would remain constant, and would not increase over time. As a result, the incremental contribution to overall traffic noise levels resulting from the project would decrease over time. For example, East Bennett Road, west of Brunswick Road, currently carries approximately 1,486 vehicles, and the associated noise level is 52.5 dBA. With the project contribution of 111 trucks, the noise level is expected to increase to 54.8 dBA, for a project-related change of 2.3 dB. However, if future traffic levels from cumulative development throughout the region were to increase by ten percent to 1,635 vehicles per day, and the project-related traffic remains at 111 trucks, the total transportation noise level would be 55.0 dBA, but the project-related change diminishes to 2.1 dBA. As a very generic example, one truck on a road that carries 1 car per day, would be quite noticeable and would be the primary noise generator. However, if the traffic increased to 100 cars per day, or say 1,000 per day, the single truck's contribution to total noise would diminish substantially. Because the future project-related traffic noise level increases would diminish over time and remain below the applicable thresholds of significance, the impact is considered to be less-than-significant relative to future cumulative traffic conditions.

Response to Comment Ind 827-9

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Traffic impacts, including the use of heavy trucks were analyzed in Chapter 4.12 of the DEIR. Regarding the possibility of brake failure, CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 827-10

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Please see Master Response 18 - Air Quality Thresholds.

It is also noted that while many of the project-related concerns noted by the commenter were not identified as significant and unavoidable in the DEIR, it is noted that under CEQA Guidelines Section 15043, the County maintains the authority to approve projects despite significant and unavoidable environmental effects under certain circumstances. Should the Nevada County Board of Supervisors seek to move forward with certifying this EIR and approving the project entitlements, due to the significant and unavoidable impacts that would occur with implementation of the project, the Board would be required to adopt a Statement of Overriding Considerations. The Statement of Overriding Considerations would publicly disclose the process by which the Board weighs the environmental impacts of the project against any other factors. As enumerated in Section 15093 of the CEQA Guidelines, factors to be balanced by the Board when considering projects that would result in a significant and unavoidable environmental impact include economic, legal, social, and technological benefits of projects as well as region-wide or statewide environmental benefits.

Response to Comment Ind 827-11

Please see Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 827-12

The mitigation measures identified by the commenter are similar to mitigation measures used for other projects in the County. Similar to other projects, the County has authority to enforce mitigation measures, conditions of approval, and the provisions of its County Code. The County charges permitted operators to recoup the County costs associated with inspections and enforcement. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 827-13

Please see Master Response 2 - Social and Economic Impacts. Please see Master Response 3 – Operator Responsibility.

The commenter asserts that the DEIR should analyze the worst case scenarios and extreme scenarios. However, California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst case scenario." (see Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 373.) While the commenter requests analysis of extreme scenarios, CEQA requires analysis of direct impacts or reasonably foreseeable indirect impacts, not speculative extreme scenarios. (Pub. Res. Code, § 2106.) As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 827-14

The commenter asserts that there may be impacts associated with heavy trucks travelling on one-lane mountain roads. However, the project does not propose truck traffic on one-lane mountain roads. Please see Chapter 3 of the DEIR.

Regarding the commenter's statements on toxic dust, air quality impacts from the project's use of trucks and all other project operations were analyzed in Chapter 4.3 of the DEIR using accepted standard methods for air quality analysis.

The commenter asserts that impacts may result from trucks spilling rock over one-lane mountain roads. As stated above, the project does not propose truck traffic on one-lane mountain roads. Further, Mitigation Measure 4.3-2 requires that trucks used for hauling material off site shall be maintained such that spillage cannot occur from holes or other openings; all loads to be hauled off site shall be adequately wetted to prevent visible dust from escaping during transportation and shall either be completely covered with tarps or have at least six inches of freeboard on the sides of the bed of the vehicle, with no excavated material extending above the edges of the vehicle bed at any point.

Please see Master Response 2 - Social and Economic Impacts. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 827-15

The Health Risk Assessment is based on conservative assumptions. Please see Master Response 22 – Conservatism of Asbestos Assumptions.

The DEIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 in the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP.

Response to Comment Ind 827-16

Please see Response to Comment Ind 827-14. Cancer risk from truck traffic was analyzed in the health risk assessment prepared for the DEIR, which found that cancer risk from the project, including traffic, was less than significant.

Response to Comment Ind 827-17

The commenter suggests that the project's required mitigation measures are cost prohibitive and therefore the project is not economically feasible. The applicant believes the project is economically feasible with consideration of mitigation costs. The commenter has not presented substantial evidence that demonstrates the project would be economically infeasible. Further, CEQA does not require that an EIR demonstrate economic feasibility of a project. Please see Master Response 2 - Social and Economic Impacts. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 827-18

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 827-19

Please see Master Response 2 - Social and Economic Impacts. Please see Master Response 3 – Operator Responsibility. Chapter 4.6 of the DEIR addresses presence of faults and impacts related to seismicity.

Response to Comment Ind 827-20

Please see Master Response 2 - Social and Economic Impacts. Insurance and capitalization are not environmental impacts requiring analysis under CEQA. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 827-21

Please see Master Response 2 - Social and Economic Impacts. Please see Master Response 3 – Operator Responsibility.

Please see Chapter 4.3 of the DEIR regarding air quality impacts and the health risk assessment's analysis of the maximally exposed individual and asbestos exposure. Please see Response to Comment Agcy 1-19, Master Response 18 - Air Quality Thresholds, Master Response 22 - Conservatism of Asbestos Assumptions, and Response to Comment Ind 827-17 regarding financial feasibility.

Response to Comment Ind 827-22

This comment is in regard to the DTSC cleanup plan for the Centennial Site, which is a separate project from the Idaho-Maryland Project. Please see Master Response 4 - Historical Mine Waste at Centennial Site, and Master Response 4, Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 827-23

The mine was closed in 1956 due to the fixed price of gold at $35 and high-cost inflation. The gold price currently trades on the free market. Please see Master Response 2 - Social and Economic Impacts and Master Response 3 - Operator Responsibility. The commenter asserts that the project violates General Plan Policy 17.9, which encourages mining of economically mineable minerals so the land can be reclaimed for alternative uses, but provides no reasoning as to why the policy is violated. Please see Response to Comment Ind 827-17 regarding financial feasibility. The commenter is also referred to Master Response 1 - Non-EIR/Administrative Issues, regarding the commenter's opposition to the project. Please see Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 827-24

Wildfire impacts are addressed in Chapter 4.13 of the DEIR. Storage of hazardous materials is analyzed in Chapter 4.7 of the DEIR. The project does not propose to store or use hazardous materials in substantially greater amounts than are stored and used at other industrial operations throughout the County. The commenter asserts that a fire at the mine site would be "Chernobyl"; however, no nuclear power generation is proposed at the project site. CEQA does not require the analysis of speculative impacts. This comment amounts to speculation, and as stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." The commenter asserts that the DEIR should analyze the worst case scenarios. However, California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst case scenario." (see Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 373.)

Response to Comment Ind 827-25

Please see Response to Comment Ind 827-24.

Response to Comment Ind 827-26

Please see Response to Comment Ind 827-8.

Response to Comment Ind 827-27

The Nevada Irrigation District (NID) approved a water supply assessment, which concluded that NID has sufficient water supplies to provide water to the parcels that are expected to be impacted by dewatering. The Water Supply Assessment (Appendix N of the DEIR) used a conservative water demand for the E. Bennett area of 0.4 gallons per minute (575 gallons per day) per dwelling unit. This is significantly larger than the average single-family home unit demand factor of 0.36 acre-feet per year per connection, which is used by NID for projecting demands (page 18 of the NID 2020 Urban Water Management Plan), and is equivalent to 321 gallons per day. The sizing of the potable water line will be determined by NID based on anticipated flow volumes. The Well Mitigation Plan (Appendix K.9), which has been revised to clarify performance standards, including use of water for irrigation, is attached to the Final EIR as Appendix D.

Response to Comment Ind 827-28

As stated on page 4.12-116 of the DEIR, queues in the northbound left turn lanes of the Brunswick Road/Sutton Way intersection would exceed the threshold of significance. Re-timing of the Brunswick Road/Sutton Way intersection would maintain LOS C conditions (29.5 seconds per vehicle) with queues declining for this movement. Following implementation of Mitigation Measure 4.12-10, the queues are shown to decrease to up to 386 feet under Scenario #1 and 434 feet under Scenario #2, both of which are less than the Cumulative No Project Condition. As such, implementation of Mitigation Measure 4.12-10 would reduce the potential impact to a less-than-significant level if implemented.

Response to Comment Ind 827-29

The commenter's preference for the No Project alternative is noted. Please see Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 827-30

The commenter does not agree with the DEIR that Alternative 2 is the environmentally superior alternative. Comment noted. The commenter also makes a statement regarding taking of riparian rights; however, the commenter does not identify what riparian rights are referenced. Riparian rights are water rights associated with properties adjacent to a stream or river and the project does not propose to eliminate any such riparian rights.

Response to Comment Ind 827-31

Please see Response to Comment Ind 827-8.

The commenter’s opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 828

Walter O'Dwyer
15851 Rattlesnake Rd.
Grass Valley, CA 95945
530 477 8529

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Brian Foss
Planning Director
Matt Kelley
Senior Planner

I Love Nevada County (Grass Valley, Nevada City, Empire Mine ect.) Most of all we are all Concerned about "Climate Change" Lets Do Our Part NO MINE! No toxic Fumes, Gas-

Ind 828-1

Smoke, Water Pollution. The County will not Profit from this MINE. Consider the Whole Picture. This Development is counterproductive to our Heath to our Air Quality and is Not Necessary Thanks for Accepting this Response

WALTER J O'DWYER
Walter J. O'Dwyer

RECEIVED
MAR 30 2022
County of Nevada
Comm Dev Agency
CDA Fiscal

INDIVIDUAL LETTER 828: WALTER O'DWYER

Response to Comment Ind 828-1

The comments does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. For concerns related to climate change, please see Master Response 16 – Drought and Climate Change. For concerns related to water pollution, please see Chapter 4.8, Hydrology and Water Quality and Master Response 35 – Discharge to South Fork Wolf Creek. Regarding air quality/toxic fume concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy.

It is also noted that the DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the DEIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HRA presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR.

Individual Letter 829

Matt Kelley,
Senior Planner
Nevada County Planning Dept
950 Maidu Ave Suite 170
Nevada City, CA 95959-7902

March 17, 2022

Dear Mr Kelley,

Ind 829-1 I have been a positive participating citizen in Nevada County since 1988. I worked as a Title 1 Teacher in the Pleasant Valley School District and later was employed as a Water Quality Monitoring Specialist at SYRCL, the South Yuba River Citizens League, and am now retired. I have been a volunteer as a Creek Monitor with Wolf Creek Community Alliance since 2010.

I have grave concerns about the Rise Gold Mine proposal that are environmental in nature.

Ind 829-2 **1)** There will be sizable **degradation to our beautiful Wolf Creek Watershed**, specifically a change to the flow in South Fork Wolf Creek, as erosion increases sediment from mining waste, which then increases turbidity, increasing water temperature which is harmful to fish, especially trout, and sensitive macro invertebrates which don't survive well in sediment laden warmer water. Additionally, needing to place rip rap creating bare soil along stream banks further disrupts the sensitive balance of the riparian habitat and the food chain of these valuable species in our watershed.

Ind 829-3 Pursuant to the **Mitigation Table on page 30, 4.4-1 through page 56**, regarding impacts to the Riparian zones along streams, once barriers are placed, seeding is done, trees planted, I see Mitigations projected for the first two years. I don't believe this will be sufficient given present drought conditions we are now facing. My experience is that establishment of transplants takes longer and is not often successful, and is further affected by increased air pollution caused by the project and should be monitored at least twice a year for at least 5 years, and potentially for the duration of the permitted process.

Ind 829-4 **2)** I have learned from those studying the impacts of the mine on our community that this mining project will use **massive amounts of energy**: 42 billion watt hours per year which is 12% of what Nevada County uses in a whole year and 100% of electricity equal to the use of all the businesses in our county. This mine would completely erase the county's plans to stay environmentally sustainable. I would **much prefer** to support these plans to **ensure sustainable living** especially during these times where we can now witness clear evidence of climate change in our own Sierra Nevada region and NOT do anything that will compromise or add to the progression of climate change such as the reopening of a gold mine. We have already had quite a negative impact from gold mining from the 1850's right here in Nevada County including toxic drainage throughout the Yuba Watershed, Mercury accumulating at the foot of dams which is extremely challenging and costly to remove and incredibly vast piles of rock and sediment along the Yuba River, one example being the Gold Fields along the Parks Bar area of the Yuba River, another near the town of Washington.

3) This brings me to my next major concern: The idea of such a toxic business right in the middle of existing residential neighborhoods is just abhorrent. Plus, the new housing areas being built right now right along the south fork of Wolf Creek will clearly have negative affects from toxic water, mine waste and **NOISE!**

Ind 829-5

Noise is a grave concern of mine. I value our life style here and hope to spend the last 30 years of my life continuing to feel at home in our safe, peaceful and quiet neighborhoods. Constant **NOISE is horrible** and is **grating on our very existence**··· continually 24 hours a day, seven days a week, for 80 YEARS of blasting, grinding, and rock hauling???? Can you even imagine that? Where will the rock debris be taken?? Truly, there is NO "AWAY"! I don't live in the proposed neighborhoods, thankfully! But I live near the highway where Truckloads would be grinding along **every day, all hours of the day, ruining my quality of life** and I know I am speaking for everyone that I know, NO ONE feels happy having to listen to loud truck or drilling NOISE! I cannot picture having meals on the deck with constant drilling, grinding and large truck hauling for anyone in the vicinity of these actions.

In reading **Impact 4.10-3 on page 94, Mitigations** include needing a blast consultant, ground vibrations monitoring consultant, my question is what can be done if it is above the levels deemed acceptable? We know there would be Absolutely Unacceptable amounts of continual Noise and Vibration if this project is begun. We love being outdoors, hiking and bicycling on our many trails, walking along the rivers and creeks. That's what this county represents for me: Peace, quiet, healthy and beautiful living, that's why most of us moved here! Have a mining project within our residential areas would be extremely stressful and not compatible with peaceful living.

Ind 829-6

Thank you very much for your consideration of my concerns. Again, please consider them carefully, looking into our personal future, in which we want to preserve the quality of life here and do not accept anything that would degrade it, and especially remember that the damage that would be done, is not UN- Do-Able, once the wrong decision is made.

Sincerely,

Wendy Thompson

Wendy Thompson
267 Bourbon Hill Road
Nevada City, CA 95959

INDIVIDUAL LETTER 829: WENDY THOMPSON

Response to Comment Ind 829-1
This is an introductory comment. Comment noted.

Response to Comment Ind 829-2
The DEIR biology and hydrology sections included analysis of treated water discharge into South Fork Wolf Creek. DEIR Impact 4.4-2 analyzed potential impacts to special-status species that may use South Fork Wolf Creek and the surrounding habitat. DEIR Impact 4.4-3 considered potential impacts to the riparian habitat surrounding South Fork Wolf Creek. DEIR Impact 4.8-1 considered whether treated water discharge would degrade water quality standards. DEIR Impact 4.8-2 analyzed potential drawdown impacts to South Fork Wolf Creek resulting from dewatering. DEIR Impact 4.8-3 considered potential erosions and sedimentation impacts resulting from treated water discharge. As demonstrated above, impacts to South Fork Wolf Creek were considered and analyzed in the DEIR.

Please also see Master Response 36 - Flows in South Fork Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, Master Response 34 - Resident Fish, and Master Response 35 - Discharge to South Fork Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

Response to Comment Ind 829-3
As explained in DEIR Mitigation Measure 4.4-1(a) and Appendix F.4, a maintenance and monitoring program is identified for transplanted Pine Hill flannellbush. Monitoring will occur every six months for the first two years. If transplantation does not meet success criteria, monitoring and maintenance will continue until those success criteria are achieved (see Appendix F.4, section 6.3.2). Irrigation is not prohibited by the DEIR and could be utilized if determined necessary to ensure the success of transplantation. The monitoring and maintenance will continue until success criteria are achieved. If those success criteria cannot be achieved, the Mitigation Measure 4.4-1(a)(5) and the management plan provides alternative maintenance transplantation measures to help achieve success criteria.

Response to Comment Ind 829-4
DEIR Chapter 4.3 analyzed the project's impact on energy and greenhouse gas emissions. DEIR Impacts 4.3-4 and 4.3-5 specifically analyzed the project's use of energy and consistency with State and local renewable energy plans and determined these impacts were less than significant. DEIR Impacts 4.3-7 and 4.3-8 analyzed the project's contribution of greenhouse gases. The DEIR requires implementation of Mitigation Measures 4.3-7(a & b) to reduce construction greenhouse gas emissions to a less than significant level, and operational greenhouse gas emissions were determined to be below the threshold of significance without mitigation. Please see Master Response 16 - Drought and Climate Change, and Master Response 25 - Nevada County Energy Plan.

DEIR impact 4.8-1 considered whether treated water discharge would degrade water quality standards and determined this impact was less than significant after mitigation. Please also see Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 829-5
As discussed on page 5 of the Noise and Vibration Assessment (DEIR Appendix L), audibility is very subjective and can vary from person to person. Thus, audibility by itself is not used as a significance criteria in evaluating noise impacts. In addition, a noise source can be audible without

a substantial increase in ambient noise levels occurring. It is important to note that residents in the general project area, including the City of Grass Valley, are currently exposed to noise from existing trucks on the area roadway network, as well as noise from automobile traffic, all of which are audible. An extensive ambient noise survey was undertaken for the project's noise impact assessment to establish baseline ambient conditions to ensure that any identified substantial noise level increases above those ambient conditions would be identified as significant and that appropriate noise mitigation measures would be developed.

Mitigation Measure 4.10-3.2 requires implementation of a comprehensive noise monitoring program to ensure that the project's noise levels satisfy the County's noise standards once the project is operational and monitoring can be conducted. Specifically, the measure requires the following: "A comprehensive noise survey shall be conducted of each facet of the operation to both verify the modelling assumptions of the project noise analysis…and to ensure that compliance with the applicable Nevada County noise standards is being achieved at nearby sensitive receptors…If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc." The noise monitoring measurements will provide a safeguard for the residents, the County and the applicant in ensuring the project's noise generation will be maintained at acceptable levels. Mitigation Measure 4.10-4 sets forth a similar ground vibration monitoring program.

Please see Master Response 1 - Non-EIR and Administrative, regarding quality-of-life concerns.

Response to Comment Ind 829-6

Please see Master Response 1 - Non-EIR and Administrative Issues.

Individual Letter 830

County of Nevada
Nevada County Planning Department
950 Maidu Avenue Suite 170
Nevada City, CA 95959-8617

March 29, 2022

To: Matt Kelley, Senior Planner

Subject: Specific Comments on the Idaho-Maryland Mine Project DEIR

Comments submitted by William J. Clark
324 Vistamont Dr.
Grass Valley, CA. 95945

DEIR Document

Idaho-Maryland Mine Project – Draft environmental Impact Report, December 2021

QUALIFICATIONS

Ind 830-1

William Clark is a 21 year resident of Grass Valley and a retired Aerospace Engineer with a Masters Degree in Systems Analysis/Electrical Engineering. His experience has been in all aspects of Systems Analysis, Systems Integration, Modeling and Design for Avionic systems and Spacecraft. He has conducted and supported Design Reviews in response to proposals from Military, Scientific, Commercial, and NASA customers.

Mr. Clark also served several terms as a member of the Nevada County Civil Grand Jury and was involved in the analysis and publication of a report on the Air Quality in Nevada County (2003).

DEIR

Page 3-39, Chapter 3.0 Project Description

Water Supply and Other Utilities

Ind 830-2

"The Idaho-Maryland Mine would have a surplus of water from the natural groundwater flow into the underground workings. Once dewatering is completed, approximately 1.9 cfs, or 850 gpm (approximately 1,224,000 gpd), are estimated to be pumped to the surface and settling pond. Such water would support all project-related water demand (i.e., mining and processing activities), except for water purchased from NID as noted below. The process plant would run on a closed circuit.

"Water consumption would include water vapor in ventilation air, cemented paste backfill, concentrates and engineered fill, and dust control and compaction of engineered fill. The following list provides a description of project elements consuming groundwater:

1

• Underground mining service water: Such uses include water use for dust suppression in rock drills and blasted rock piles, which is piped into the mine workings. Net consumption of water would not result from such activities, because water in underground workings is pumped to the surface for reuse.
• Water Vapor in Ventilation: Ventilation air flow through the mine working would become saturated with water vapor, consuming approximately 40,000 gpd of water.
• Cemented Paste Backfill: Water is needed to transport and bind the cemented paste backfill underground. Such water is permanently retained in the backfill or used in the hydration of cement. Backfilling would consume approximately 20,000 gpd of water, assuming a 15 percent water content by mass and 500 tons per day of backfill placed.
• Gold Concentrates and Engineered Fill: Concentrates and engineered fill shipped off-site would contain approximately 24,000 gpd of water.
• Dust Control and Compaction: Active fill areas and unpaved surfaces require water to control fugitive dust, and engineered fill placed at the Brunswick and Centennial Industrial Sites would need to be compacted to meet design standards. Such activities would consume up to 42,000 gpd of water."

Comment: One item on the list is **Water Vapor in Ventilation**. Nowhere in the DEIR or in the Appendices is this item discussed, nor are any analyses presented to explain how the value of 40,000 gallons per day was calculated. There are no lists of assumptions, meteorological values used, or any information on real-world underground mine operations that might produce this condition. Also, there is no discussion for the situation where saturated air venting to the ambient environment during a Winter season may produce clouds of vapor, fog, or other visual effects. The EIR must address this deficiency.

Question: Will the EIR address this subject and present the analyses that produced this amount of water in saturated air within the mine? Will the presentation determine whether the vented air might produce clouds of vapor or fog during Winter months?

Pages 3-13 & 3-31

The proposed above ground building layout on the Brunswick site shows the Change Room/Office building adjacent to the Service Shaft. The DEIR does not discuss the detailed operation of the Change Room except to say the building is 24,000 sq feet in area.

Comment: The Change Room could be where miners come in for a shift and change into clothing suitable for conducting drilling, blasting, and moving tons of broken rock or ore from tunnels and stopes to the Brunswick shaft silo. Then, after shift, the miners enter the change room to change from their mining clothes into their street clothes and exit the building.

Ind 830-3

Absent any substantive discussion in the DEIR on this subject, one can envision the following scenario – the miners suit up in their mining garb, descend in the Service shaft to their assigned tunnel some thousands of feet underground and work their 12 hour shifts drilling, blasting, and moving tons of broken rock and ore up to the surface into the Brunswick silo. During their work shift, the miners are exposed to the toxic dust, blast particulates, silica dust and Asbestos fibers that collect on their skin and their mining clothes, despite the ventilation, the filtering and water

spray employed. When they ascend to the surface and enter the Change Room, they litter the surroundings with fugitive dust, silica particles and Asbestos fibers. They shower and clean themselves and put on their street clothes and exit the Change Room building, leaving behind their miner's clothing saturated with toxic contaminants and the toxic laden water from the showers that must be drained back into the mine.

Whatever amount of toxic contaminants were that contained within the underground tunnels and stopes has inadvertently been brought to the surface, despite the heroic measures employed to minimize the contaminants escape from the confines of the mine. The DEIR must address this problem and present a design solution with details that describe each step in the process where miners enter and exit the Change Room.

Question: To what level has the applicant studied this problem? Will the EIR contain details of the miner's use of the Change Room with regard to bringing fugitive toxic contaminants from the mine to the above ground surroundings?

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INDIVIDUAL LETTER 830: WILLIAM CLARK (1)

Response to Comment Ind 830-1

The County acknowledges the comment as background information about the commenter. Comment noted.

Response to Comment Ind 830-2

As stated on page 10 of the Water Supply Assessment (WSA) (Appendix N of the DEIR), the water vapor in ventilation air is assumed at 200,000 CFM airflow at 100 % saturation of air at 68 degrees F. As discussed on pages 10 and 11 of the WSA, the non-potable water demand, including water vapor in ventilation, is only 10 percent of the dewatering volume that will be needed. Therefore, the proposed project's non-potable water demands are not discussed further in the WSA. Further refinement of the water lost in water vapor from the mine would serve no purpose and is not required for the analysis of the EIR.

The project would not produce clouds of vapor or fog. Please see Response to Comment Grp 7-95 regarding clouds of vapor or fog from ventilation.

Response to Comment Ind 830-3

Workplace health and hygiene at mines is regulated by the US Mine Safety and Health Administration (MSHA). Mine workers who work in wet environments wear waterproof jackets and pants and do not have clothing saturated with "toxic laden water". Generally, a mine worker washes their boots underground before entering the cage, leaves their boots in the locker area adjacent to the service shaft building, hangs work clothes in the mine dry on baskets, showers, dresses in street clothes, and then exits to the parking lot. The mine facilities are kept clean by janitorial services and work clothing is routinely washed. The general layout of proposed buildings is provided in submitted drawings below.

https://www.nevadacountyca.gov/DocumentCenter/View/30392/Service-Shaft

https://www.nevadacountyca.gov/DocumentCenter/View/30389/Office-and-Water-Treatment

A description of the detailed operations of the Change Room is not required for the analysis of the DEIR, as the amount of rock dust that would be carried on worker's clothing is imperceptible compared to the emissions from other aspects of the project (e.g., hoisting of rock to the surface, loading of trucks, placement of engineered fill, which emissions impacts were considered to be less than significant after mitigation). The emissions associated with mine worker clothing is negligible and would not impact the analysis.

Individual Letter 831

County of Nevada
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-8617

March 29, 2022

To: Matt Kelley, Senior Planner

Subject: Comments on the Idaho-Maryland Mine Project DEIR and Appendix E-1

Comments submitted by William J. Clark
324 Vistamont Dr.
Grass Valley, Ca. 95945

DEIR Documents

1. Appendix E-1 Air Quality and Greenhouse Gas Emissions Analysis Technical Report for the Idaho-Maryland Mine Project Nevada County, California November 20

2. IMM DEIR, December 2021, Section 4.3 Air Quality, Greenhouse Gas Emissions, And Energy

SUMMARY

With respect to Air Quality concerns, the IMM project design has undergone a series of evolutions as described in earlier editions of Air Quality technical reports. Unfortunately, design modifications, changes, and updates have not been presented in a manner that is transparent to a reviewer to understand and critique the evolving design and environmental impacts. The following comments identify specifics of the IMM design as described in the DEIR documents and also question some changes and omissions that have been carried forward to the current documents: IMM DEIR and Appendix E-1.

Without additional information and supporting analyses for key elements of the report, this reviewer cannot declare this DEIR to be both adequate and representative of a final project design with respect to Air Quality and Greenhouse Gas Emissions.

Direct quotes are presented in Italics. In certain instances, information from earlier "editions' of Air Quality reports are included to illuminate areas in question and this information is in indented text.

Finally, deficiencies in certain Mitigations for Air Quality and GHG Emissions are discussed and additional mitigations are suggested for inclusion in the final EIR.

Ind 831-1

1

QUALIFICATIONS

William Clark is a 21 year resident of Grass Valley and a retired Aerospace Engineer with a Masters Degree in Systems Analysis/Electrical Engineering. His experience has been in all aspects of Systems Analysis, Systems Integration, Modeling and Design for Avionic systems and Spacecraft. He has conducted and supported Design Reviews in response to proposals from Military, Scientific, Commercial, and NASA customers.

Ind 831-2

Mr. Clark also served several terms as a member of the Nevada County Civil Grand Jury and was involved in the analysis and publication of a report on the Air Quality in Nevada County (2003).

1.0 Air Quality & GHG Emissions Analysis & Technical Report-Nov 2021 (Appendix E-1)

Page v, Executive Summary

"*During construction and operations, daily unmitigated emissions of ROG, NOx, and PM10 would be potentially significant (Level A or B) according to the NSAQMD significance criteria; therefore, mitigation is required. The NSAQMD does not have significance criteria for SO2, CO, or PM2.5. According to NSAQMD guidance, emissions exceeding the Level A significance threshold would contribute to existing nonattainment conditions and may also interfere with the region's ability to maintain ambient air quality standards if no mitigation is implemented. Per the NSAQMD, implementation of recommended mitigation measures for Level A and B thresholds would reduce project impacts from potentially significant to less than significant. Thus, ROG, NOx, and PM10 would be at either Level A or B and would be less than significant during all years of project construction and operation after implementation of MM-AQ-1 (Mitigations for Use During Construction) and MM-AQ-2 (Construction Exhaust Emissions Minimization Plan). Because construction and operation of the project would not exceed the NSAQMD significance thresholds for ROG, NOx, or PM10, and because the NSAQMD thresholds are based on levels that the MCAB can accommodate without affecting the attainment date for the Ambient Air Quality Standards (AAQS) (the AAQS are established to protect public health and welfare), it is anticipated that the project would result in less-than-significant health effects associated with ROG, NOx, and PM10.*"

Ind 831-3

Comment: The mitigations mentioned here deal with dust and above ground diesel exhaust emissions. However, there will be pollutants and toxic particles generated underground by drilling and blasting that most likely will be exhausted from the 165 ft headframe vent stack and carried around the surrounding environment during the 80 year project. These pollutants consist of ROG, NO_x, PM2.5, PM10, Asbestos fibers and Silica dust. Mitigations must be developed to prevent this.

2

The ASUR Plan (DEIR Appendix E-2) discusses the ventilation engineering controls and air filtration designed to remove 95% of asbestos fibers but is silent on the controls for the pollutants mentioned above.

Question: Why aren't these impacts addressed? Will there be plans in place to address this problem prior to project approval? Will mitigations be developed to address these pollutants?

Page 9, Section 2.1.2.2 Non-Criteria Air Pollutants

Crystalline Silica

Ind 831-4

"In February 2005, the California Office of Environmental Health Hazard Assessment added a chronic reference exposure level for crystalline silica (quartz, cristobalite, tridymite) of respirable size (defined as 4 micrometer particle aerodynamic diameter) (OEHHA 2005). Crystalline silica is a hazardous substance when it is inhaled, and the airborne dust particles that are formed when the material containing the silica is broken, crushed, or sawn pose potential risks. Silicosis results from chronic exposure; it is characterized by the presence of histologically unique silicotic nodules and by fibrotic scarring of the lung (OEHHA 2005). Chronic exposure to respirable silica dust is also associated with the development of tuberculosis/silicotuberculosis, chronic bronchitis, small airways disease, emphysema, and has been implicated in some autoimmune disorders and kidney disease (OEHHA 2005)."

Comment: There is no analysis, test results, discussion or other information presented to address the health hazards of silica dust or silica fragments. Since rock types in the mine include silica bearing minerals, the potential health hazards from airborne silica fragments must be evaluated, and appropriate mitigations must be provided in the EIR.

Question: How will the applicant address this problem and what mitigations will be developed to prevent these toxic substances from being exhausted to the surroundings via the headframe ventilation stack?

Page 18, Section2.3.2 Local Ambient Air Quality

Ind 831-5

"CARB, air districts, and other agencies monitor ambient air quality at approximately 250 air quality monitoring stations across the state. NSAQMD monitors local ambient air quality near the project site. Air quality monitoring stations usually measure pollutant concentrations 10 feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. The most recent background ambient air quality data from 2016 to 2018 are presented in Table 2, Local Ambient Air Quality Data. The Grass Valley monitoring station, located at 200 Litton Drive, Suite 230, Grass Valley, CA 95945, is the nearest air quality monitoring station to the project site, located approximately 1-mile northwest of the Centennial Industrial Site. However, because the Grass Valley station only monitors O3 and PM2.5, additional measurements were taken from the Yuba City monitoring station (773 Almond Street, Yuba City, CA 95991), approximately 31 miles west of the project site). The data collected at these stations are considered generally representative of the air quality experienced in the

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project vicinity. The number of days exceeding the ambient air quality standards are also provided in Table 2."

Comment: The effort to create a viable air quality environment model for the project vicinity required the use of data obtained from local and out of area locations. While laudable in intent, the result misses the mark. For example, PM10 measured in Yuba City located 31 miles to the West of the site will not measure true PM10 emissions from the site since prevailing winds blow from the South and Northeast. Also, Yuba City is 95 ft elevation compared to 2700+ ft at the project site. The same inconsistencies exist for measurements of NO2 and CO. Also, the use of outdated air quality data requires a stretch of imagination since the underlying assumption is that nothing has changed in the interim – be it population, vehicles owned, residential housing developed, and new construction projects.

The DEIR should include more comprehensive pertinent data from NSAQMD and the CARB to obtain current and future predictions for the pollutants and TACs discussed in the DEIR.

Question: Since there were no other sources for measurements of these pollutants, why is there no discussion of the validity of the air quality data presented or the confidence level of the data? How can the predictions for air quality measurements be justified over the 80 year span of the IMM project? How were the results for air quality measurements and emissions vetted prior to inclusion in the DEIR?

Page 25, Section 2.4.2.1 Construction Emissions

... *"To account for dust control measures in the calculations, it was assumed that active work sites would be watered at least two times daily, resulting in an approximately 55% reduction of particulate matter. In addition, chemical stabilizers would be applied to any unpaved roads on-site, which would result in an approximately 80% reduction of particulate matter. For a worst-case day, it was conservatively assumed that 2 diesel emergency generators (2,655 horsepower (hp) each) would undergo routine testing and maintenance of up to 2 hours each on the same day, 1 time per month. For annual emissions, these emergency generators were assumed to undergo testing and maintenance for up to 100 hours, based on CARB's ATCM for Stationary Compression Ignition Engines. Emission data sheets for the representative Cummins model QSK60-G17, which are Tier 4 Final engines, were incorporated into the modeling. Detailed assumptions and emission factors are included in Appendix A. Notably, electrically powered equipment would not contribute to criteria air pollutants or TACs at the project site, but would result in GHGs associated with electricity generation (see Section 3, Greenhouse Gas Emissions)."*

Ind 831-6

Question: Under what assumptions regarding temperatures, humidity, wind, and surface material composition would watering active work sites result in a 55% reduction of particulate matter? Is there test data to back up this claim? How sensitive is this 55% number? How would predictions change if the number was 25%, or 75%? Same question for the 80% reduction of

particulate matter by applying chemical stabilizers to unpaved roads. What is the composition of these chemical stabilizers?

Page 57, Section 2.6 Emergency Generator use during PSPS

"Public Safety Power Shutoffs are infrequent (as an example, 9 days of power outages would be a conservative representation based on the Public Safety Power Shutoffs in recent years) and emergency generator use may not be needed at all during construction and/or years of operations. However, for disclosure, maximum daily emissions were estimated for 2,655 hp emergency generator usage during construction (two generators) and operations (four generators), assuming all emergency generators would operate for 24 hours per day. Emissions for the generators were estimated based on the exhaust emission data sheets for the representative Cummins model QSK60-G17, which are Tier 4 Final engines. Since the use of emergency generators is speculative and beyond the reasonable control of Rise Grass Valley, Inc., the emissions presented in Table 19 are for informational purposes only."

Ind 831-7

Comment: In the past two years power outages have occurred twice a year and have become predictable, as PGE should attest. Whenever valley winds are above a certain level, PGE institutes a PSPS that effects Nevada County even though the high winds and wind gusts are in areas far removed from our location. These winds are predictable in the Spring, Summer, and Fall, though the exact days are not. Rain and snow storms have caused power outages County wide for two weeks in some areas. Given these "real world" events, a conservative time span for generator usage would be of the order of two weeks a year – one week in Spring/Summer and one week in Fall/Winter which would require generator usage for a total of 336 hours per year. Emission results should include this usage and should not state this to be "speculative". These events will continue to occur and are predictable during the year. The exact days and weeks during the year remain speculative. Power outage calculations should take into consideration the recent historical record of power outages.

Question: Will the emissions from emergency generator usage be removed from the "speculative" nature to a "predictable" nature and be included in the emission table as occurring throughout the year? Will PGE be contacted to acknowledge a predictable number of PSPS outages per year? What are the reasons not to include the generator emissions in the emission tables as predictable outages?

The DEIR should include power outages values based upon the average of the past three years and with consideration of the projected increased lengths and severities of the fire season.

Page 10 – 11, Appendix B, Section 4.1 Dispersion Model, Table 2.

Ind 831-8

Comment: Table 2 contains several errors in the description of Emission sources used as input data to the mathematical and computer models to produce dispersion predictions. Emission

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sources STCK 8, STCK9, STCK10, and SLN1- SLN9 are incorrect. In view of these input "errors" the dispersion results and conclusions reached based on the results are unreliable. This analysis must be redone.

Question: Please explain why certain of the data is obviously incorrect and why were they used in the Dispersion models? Why were base elevation values not checked for consistency (feet/meters)? For STCK8, what is the basis for the values for gas exit temperature, exit velocity, or exit flow rate? What were the methods used to verify these input values and what check cases were run to validate the dispersion models used and the results obtained?

Page 12, Appendix B, Section 4.1, Dispersion Model

*"• **Meteorological Data:** The nearest stations with processed meteorological data for use in AERMOD are Blue Canyon (17 miles away), Auburn (18 miles away), and Beale (22 miles away). The predominant wind direction at the project site is from the North-East and South-West direction (Meteoblue 2020). The Blue Canyon met station has a predominant wind direction from the North-East and South; the Auburn met station from the East; and the Beale met station from the South-East and North-West (CARB 2020). Blue Canyon was selected since it is the closest station and is the most representative of the project site. The latest 6-year meteorological data (2009–2014) for the Blue Canyon – Nyack Airport were downloaded from CARB, and then input to AERMOD. A wind rose is provided for this station in Figure 1."*

*"• **Urban and Rural Options**: Typically, urban areas have more surface roughness and structures and low albedo surfaces that absorb more sunlight, and thus, more heat, relative to rural areas. The rural dispersion option was selected based on the predominant development within 2 kilometers of the project site."*

Ind 831-9

*"• **Terrain Characteristics**: Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate for the site. This accounts for complex terrain within 2 kilometers of the site. The National Elevation Dataset (NED) dataset with resolution of 1/3 arc-second was used. The AERMAP terrain preprocessor, which can process U.S. Geological Survey (USGS) Digital Elevation Model (DEM) data and data from the NED, is also used to generate the terrain elevations for the receptor locations. The AERMAP program generates an output file that contains the receptor pathway data for AERMOD."*

Comment: Blue Canyon is located in the Sierra Nevada Mountains at almost twice the elevation of the project site and subsequent meteorological changes associated: 10° lower temperature differential, different types and amounts of precipitation, etc. AERMOD was corrected for elevation but nearly all parameters related to weather would need to be corrected for accuracy. Air density is related to altitude, atmospheric pressure, temperature and humidity. Atmospheric pressure decreases as altitude increases along with effects of solar radiation.

For example, the hot season lasts for 3.1 months in Grass Valley, from June 15 to September 18, with an average daily high temperature above 81° F. In Blue Canyon there is no hot season. The warm season there lasts for 2.9 months, from June 20 to September 18, with an average daily

high temperature above 72°F. Average hourly temperatures also vary dramatically between the two locations. Temperature ranges as well as hourly temperatures have a significant impact on ozone production. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The entire model set and input data parameters must be revisited and a revised set of dispersion data must be included int the EIR.

See Page 3, Section 2.1.1 Meteorological and Topographical Conditions.

"The prevailing wind direction over the County is westerly. However, the terrain of the area has a great influence on local winds, so that wide variability in wind direction can be expected. Afternoon winds are generally channeled up-canyon, while nighttime winds generally flow down-canyon. Winds are, in general, stronger in spring and summer and lower in fall and winter. Periods of calm winds and clear skies in fall and winter often result in strong, ground-based inversions forming in mountain valleys. These layers of very stable air restrict the dispersal of pollutants, trapping these pollutants near the ground, representing the worst conditions for local air pollution occurring in the County."

Ind 831-10

Question: Given the differences between Blue Canyon and Nevada County, what is the basis to equate the two areas when analyzing the impacts to the air quality in the grass valley area? What test cases were run to verify and validate the topographical and meteorological model created from the sources described? Was the climate model vetted by third party sources such as NSAQMD or CARB? Given the errors mentioned in Table 2 (Emission Sources), how can the predictions for the effects on Air Quality at the IMM project site by taken with any degree of confidence? Why was the **Urban/Rural** choice taken as **Rural** when Grass Valley has become more **Urban** over the past 8 years since 2014? Why wasn't the dispersion model exercised with the **Urban** data to produce results that could be compared with results using the **Rural** data? Why wasn't more recent data used instead of relying on 8 year old data? The results from the model are unreliable and should be redone with correct inputs.

Page 74, Section 3.2.3.3 Nevada County (Local Regulations)

"Nevada County adopted the Nevada County Energy Action Plan (EAP) in February 2019 (Nevada County 2019), which provides an analysis of the energy use within the unincorporated County limits and County operated facilities, as well as strategies for accelerating energy efficiency, water efficiency, and renewable energy efforts already underway in Nevada County. The goal of the EAP is to reduce the projected annual grid supplied electricity use in 2035 by 51%, and annual natural gas use by 30%. Notably, the actions within the EAP are voluntary and do not require the County or community to meet the reduction goals; however, savings may only be realized if the recommended actions are taken (Nevada County 2019)."

Ind 831-11

Comment: There are no plans discussed in this report that speak to the use of Solar energy to provide electrical power to keep the batteries of the underground equipment in a full state of charge. Now that more electrical equipment is proposed in order to eliminate pollution sources specific to diesel engines, Solar energy could be a useful solution to minimize the generation of local energy from PGE. PGE would realize a benefit from not having to generate the large

electrical demand to meet the needs of the IMM project and would reduce the GHG associated with energy production.

Question: Why isn't the energy consumption of the project mitigated with a solar energy system?

Page 78, section 3.4.1 Thresholds of Significance

"The significance criteria used to evaluate the project's GHG emissions impacts are based on the recommendations provided in Appendix G of the CEQA Guidelines. For the purposes of this GHG emissions analysis, the project would have a significant environmental impact if it would (14 CCR 15000 et seq.):

1. *Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.*

2. *Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. At this time, neither the NSAQMD nor the County has adopted numerical thresholds of significance for GHG emissions that would apply to the project. The NSAQMD, however, recommends that all projects subject to CEQA review be considered in the context of GHG emissions and climate change impacts, and that CEQA documents include a quantification of GHG emissions from all project sources, as well as minimize and mitigate GHG emissions as feasible (NSAQMD 2019). The project would generate GHG emissions through short-term construction activities and long-term operational activities."*

Ind 831-12

Comment: These statements apply to the IMM project. Since the project will use cement to mix with ore rock tailings in a slurry to backfill mine tunnels and raises no longer used, the amount of GHG (CO2) generated to produce an amount of cement in the order of 500 tons per day will be over 10,000 MT CO_{2e} per year in the location of the producing source. So, as a result of the use of this cement, the IMM project has a significant impact on the environment.

Question: Why hasn't this fact been presented and discussed in the DEIR so the residents of Nevada County can make a reasoned assessment of the impact that the project will have on the environment either directly or indirectly?

NOTE: The following material has not been included in Appendix E-1. It is important that the Nevada County Lead Agency be aware of this information that spotlights the deficiencies of Appendix E-1. The final EIR must respond to this information to allow residents of Nevada County to fully appreciate how the IMM project will affect their lives. The Applicant Proposed Measures discussed are in indented text.

Ind 831-13

Page 38, Section 2.4.3 Applicant proposed Measures

In the **December 2020** edition of this Air Quality and GHG Emissions report, two Applicant Proposed Measures (APM) were added. These Applicant Proposed Measures are relevant to the

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air quality analysis and are presented below. This Impact Analysis assumes that all APMs would be implemented as conditions of approval, as defined below. However, neither one of these APM's has been carried forward to the DEIR or Appendix E-1 nor has any discussion or analyses been presented to explain or justify the removal of these APM's.

> *"**APM-AQ-3**: Underground Fugitive Asbestos Dust Control. Rise Grass Valley Inc. shall employ ventilation engineering controls systems for all mine headings where tunneling is taking place in serpentinite containing asbestos. The engineering controls will be designed to prevent asbestos fibers from exhausting from tunneling areas into the main ventilation system of the underground mine and consequently from being exhausted from the underground mine to the surface. Engineering controls could include air filtration, water curtains, or other methods designed to remove 90% of asbestos fibers."*

Comment: There is no discussion of the ventilation systems, engineering controls, filtration, or other methods used to mitigate the Asbestos exposure to mine workers or the above ground population. There is no discussion or analysis to verify that the solutions alluded to will remove 90% of Asbestos fibers. There is no analysis or discussion to explain how the remaining 10% of Asbestos fibers will be prevented from being exhausted from the headframe vent stack into the ambient environment.

Question: Why is the analysis and discussion to address the above issues not presented in the DEIR? Where have the Health Risks been analyzed that used a range of values for Asbestos or silica? How sensitive are the Health Risks for slight changes in the amounts of Asbestos or silica? In other words, what are the safety factors in the results? How much confidence is there for the 90% Asbestos removal?

> *"**APM-AQ-4**: Air Quality Monitoring. Rise Grass Valley Inc. shall coordinate with the Northern Sierra Air Quality Management District to develop an appropriate air pollutant monitoring protocol to install and operate particulate matter monitoring equipment at an upwind and downwind location on the boundaries of the Brunswick and Centennial Industrial Sites."*

Ind 831-14

Comment: These two APM's are Applicant Proposed Measures. However, their elimination implies that the applicant is no longer in favor of such measures. The Air Quality monitoring measure needs to be implemented and to be in force before any construction activity is started. These monitoring stations must be operational in order to establish a baseline of pollution monitoring before and during construction and mining operations. Equipment should be installed to measure Ozone, PM2.5, PM10, SO2 and NO_x. There is no discussion in this report that explains why this APM has been removed and there is no information presented as to possible benefits to the IMM project or the surrounding environment that may be achieved by removing this APM.

(The value of such coordination with the NSAQMD has been verified by a personal communication between William Clark and Sam Longmire of NSAQMD on Feb 4, 2022.)

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Question: What are the reasons for removing this APM from the Air Quality and GHG Emissions Analysis report? How will the applicant monitor the project environment to provide information to analyze the effectiveness or lack thereof of the various mitigation plans proposed? What is the benefit to the applicant and the surrounding community for removing this APM?

Air Quality & GHG Emissions Analysis & Technical Report – MARCH 2021

Pages 32-33, Section 2.4.2.4 Health Risk Assessment

> *"The TAC emissions associated with blasting and crushing, ore processing, and earthwork and material handling would include asbestos and silica emitted from the fugitive dust produced. The applicant estimates that the ore processed would be quartz veins hosted primarily within andesite rock and an assumed 60% silica content. The applicant has prepared an Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR Plan) which is designed to exclude asbestos containing material, serpentinite, or ultramafic rock from the engineered fill produced by the project (Rise Grass Valley Inc. 2021). The ASUR plan also is designed to prevent the emission of dust from the underground mine which contains asbestos. For conservatism in the modelling of TAC emissions, the materials mined and engineered fill are assumed to be composed of 1% serpentinite with an asbestos content of 0.25%, which is the detection limit for the bulk asbestos testing proposed in the ASUR plan. The average asbestos content of the total mined material, assumed at 0.0025%, is of primary concern since asbestos does not have established acute noncancer effects (OEHHA 2020). Therefore, only the average asbestos emissions that could be generated over the long-term (per year), and associated long-term health risk, has been evaluated herein. However, it should be noted that since mine operations would be required to comply with MSHA PELs that protect underground workers from asbestos fiber exposure during short-term shifts, this compliance would also result in limiting potential emissions of asbestos aboveground from the shaft in general."*

Ind 831-15

Comment: In the **March 2021**edition of the report the Asbestos content was assumed to be 0.0025%. In the **December 2020** version the value was 0.0108% based on lab results, not assumptions. There are no analyses presented to validate this assumption. There are no analyses or test results presented that justify assigning a value of 0.25% just because it is the detection limit for bulk testing. It is recognized that TEM testing is many times more sensitive to bulk testing yet this test method is not discussed here. Health Risk predictions must be called to question until this discrepancy is resolved. This Health Risk assessment must be repeated before the IMM project can proceed.

It is possible that these contradictions are the result of new and better data and/or analyses and the data presented in the DEIR represent the current project design. But without a paper trail or other explanations, this is entirely speculative.

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Question: What is the explanation for this major discrepancy? What assurances can the applicant provide that measurement methodologies will be accurate?

> *"Blasting and crushing would also result in emissions of dust with trace heavy metal TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium. Concentrations of each heavy metal within the barren and mineralized rock was taken from Table 4-7 of the Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project (EMKO Environmental, Inc. 2020). Based on the PM10 emissions estimated, emissions of asbestos, silica, and heavy metals were estimated for purposes of the health risk modeling. As described in the ASUR Plan, the project would employ ventilation engineering controls systems for all mine headings where tunneling is taking place in serpentinite containing asbestos. The engineering controls will be designed to prevent asbestos fibers from exhausting from tunneling areas into the main ventilation system of the underground mine and consequently from being exhausted from the underground mine to surface. Engineering controls would include air filtration designed to remove 95% of asbestos fibers. Other emissions of TACs from blasting pertain to the combustion of ANFO, which were estimated based on emission factors from AB 2588 Combustion Emission Factors (Ventura County Air Pollution Control District 2001)."*

Ind 831-16

Comment: In the **December 2020** edition of this report, engineering controls would be employed to remove 90% of asbestos fibers. This edition of the report states that filtration systems will remove 95% of asbestos fibers. However, there are no analyses or test results or demonstrated methods presented that validate either of these values. If this report is correct, 5% of asbestos fibers will exhaust via the headframe ventilation stack to the surrounding environment and will be spread around by the prevailing winds.

The ASUR Plan states that MERV-16 filters will be employed to filter 95% of fugitive Asbestos dust and fibers in the tunnels and stopes of the mine. An on-line source for MERV-16 filters states that the filters will filter 90% of particulate matter. It is not clear from the above discussion how these filters will filter to the 95% level.

Question: How will this contradiction be resolved? Will the applicant present rest results to defend the capabilities of the MERV-16 filters? How will the remaining 5% of asbestos fibers be prevented from exhausting to the surrounding environment by the headframe ventilation stack?

2.0 IMM DEIR, December 2021, Section 4.3 Air Quality, Greenhouse Gas Emissions, And Energy

Ind 831-17

Page 4.3-2

> *"The prevailing wind direction over the County is westerly. However, the terrain of the area has a great influence on local winds, so that wide variability in wind direction can be expected. Afternoon winds are generally channeled up-canyon, while nighttime winds generally flow down-canyon. Winds are, in general, stronger in spring and summer and lower in fall and*

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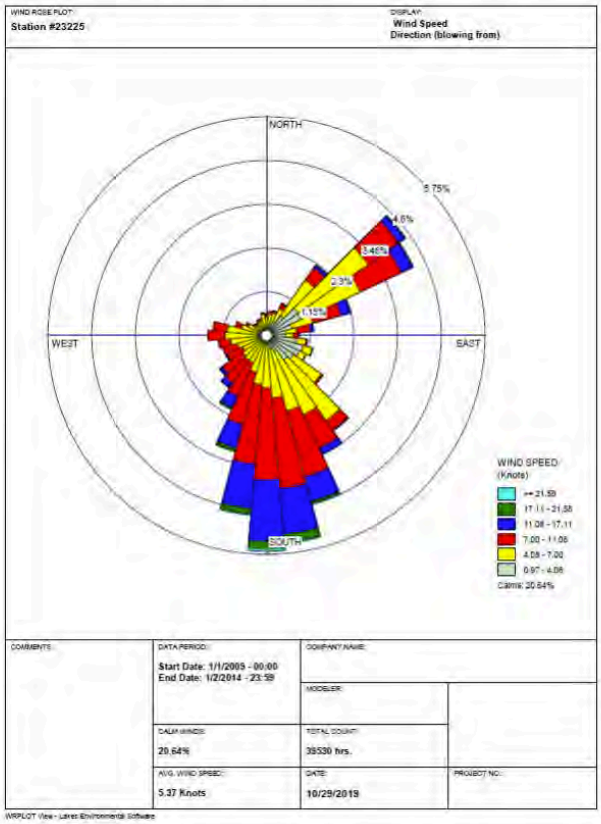
winter. Periods of calm winds and clear skies in fall and winter often result in strong, ground-based inversions forming in mountain valleys. These layers of very stable air restrict the dispersal of pollutants, trapping these pollutants near the ground, representing the worst conditions for local air pollution occurring in the County."

Comment: This statement above concerning prevailing wind direction is in direct conflict with the Wind Rose plot on page 16 of section 4.1 of Appendix B. Dispersion Model shown below: One can see the prevailing winds are from the South, South West, and North East.



Question: Why is this contradiction presented in the report? Why is this contradiction carried forward through every edition of the Air Quality reports to appear in the DEIR? Why is there no discussion to reconcile this conflict?

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Ind 831-18

Page 4.3-9 Crystalline Silica

"In February 2005, the California Office of Environmental Health Hazard Assessment (OEHHA) added a chronic reference exposure level for crystalline silica (quartz, cristobalite, tridymite) of respirable size (defined as 4 micrometer particle aerodynamic diameter. Crystalline silica is a hazardous substance when it is inhaled, and the airborne dust particles that are formed when the material containing the silica is broken, crushed, or sawn pose potential risks. Silicosis results from chronic exposure; it is characterized by the presence of histologically unique silicotic nodules and by fibrotic scarring of the lung. Chronic exposure to respirable silica dust is also associated with the development of tuberculosis/silicotuberculosis, chronic bronchitis, small airways disease, emphysema, and has been implicated in some autoimmune disorders and kidney disease."

Comment: There is no analysis, test results, discussion or other information presented to address the health hazards of silica dust or silica fragments. Since rock types in the mine include silica bearing minerals, the potential health hazards from airborne silica fragments must be evaluated, and appropriate mitigations must be provided in the EIR.

Question: How will the applicant address this problem and what mitigations will be developed to prevent these toxic substances from being exhausted to the surroundings via the headframe ventilation stack?

Ind 831-19

Pages 4.3-10, 11 & Table 4.3.4

"The Grass Valley monitoring station, located at 200 Litton Drive, Suite 230, Grass Valley, CA 95945, is the nearest air quality monitoring station to the project sites, located approximately one mile northwest of the Centennial Industrial Site. However, because the Grass Valley station only monitors ozone (O3) and PM2.5, additional measurements were taken from the Yuba City monitoring station (773 Almond Street, Yuba City, CA 95991), approximately 31 miles west of the project sites. The data collected at these stations are considered generally representative of the air quality experienced in the project vicinity."

Comment: The effort to create a viable air quality environment model for the project vicinity required the use of data obtained from local and out of area locations. While laudable in intent, the result misses the mark. For example, PM10 measured in Yuba City located 31 miles to the West of the site will not measure true PM10 emissions from the site since prevailing winds blow from the South and Northeast. Also, Yuba City is 95 ft elevation compared to 2700+ ft at the project site. The same inconsistencies exist for measurements of NO2 and CO. Also, the use of outdated air quality data requires a stretch of imagination since the underlying assumption is that nothing has changed in the interim – be it population, vehicles owned, residential housing developed, and new construction projects.

Question: Since there were no other sources for measurements of these pollutants, why is there no discussion of the validity of the air quality data presented or the confidence level of the data? How can the predictions for air quality measurements be justified over the 80 year span of the IMM project? How were the results for air quality measurements vetted for inclusion in the DEIR?

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Page 4.3-32 EO N-79-20

"EO N-79-20 (September 2020) establishes a Statewide goal that 100 percent of in-state vehicle sales of new passenger cars and trucks shall be zero-emission by the year 2035. The order directed the CARB to develop and propose passenger vehicle and truck regulations requiring increasing volumes of new zero-emission vehicles sold in the State in order to achieve the goal by 2035. In addition, the order required that a Zero-Emissions Vehicle Market Development Strategy be created and updated to ensure coordinated and expeditious implementation of the EO."

Ind 831-20

Comment: The IMM project period is well within the time span to meet this Zero Emission Vehicle goal. The applicant should be made aware of the State's goal and be required to disclose the project's plans to accommodate this goal. The purchase of out of state vehicles should be discouraged. Contractors used by the applicant should also respond to this order as well as companies that supply rented or leased equipment.

Page 4.3-46, Table 4.3.7 Construction Off-Road Equipment Assumptions

Ind 831-21

Question: The table lists several ventilation fans used during construction. Main Ventilation Fan (1); Booster Ventilation Fans (2); Auxiliary Ventilation Fans (3). There is no discussion of these fans in this DEIR section or in Appendix E-1. Where are they used? During which phases of the project do they operate? Where are they located? What are the fan speeds, air flow, etc. Will The applicant develop an operational timeline that explains where each of these fans are employed?

Page 4.3-49

"Entrained or fugitive dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, primarily during the grading phase, resulting in PM10 and PM2.5 emissions. The project would include implementation of Surface Fugitive Dust Controls, which would limit fugitive dust (PM10 and PM2.5) that may be generated during grading and construction activities through activities such as limiting vehicle speeds on unpaved roads, watering exposed surfaces periodically, and covering material stockpiles, among other strategies to reduce fugitive dust. To account for dust control measures in the calculations, the assumption was made that active work sites would be watered at least two times daily, resulting in an approximately 55 percent reduction of particulate matter. In addition, chemical stabilizers would be applied to any unpaved roads on-site, which would result in an approximately 80 percent reduction of particulate matter."

Ind 831-22

Question: Under what assumptions regarding temperatures, humidity, wind, and surface material composition would watering active work sites result in a 55% reduction of particulate matter? Is there test data to back up this claim? How sensitive is this 55% number? How would predictions change if the number was 25%, or 75%? Same question for the 80% reduction of particulate matter by applying chemical stabilizers to unpaved roads. What is the composition of these chemical stabilizers?

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Page 4.3-50

"Off-Road Equipment
Operational equipment is summarized in Table 4.3-10. Emission factors for these sources were incorporated into a spreadsheet model that includes the CARB OFFROAD2011 model for diesel fueled off-road equipment (see Appendix A of the Dudek Analysis, included as Appendix E.1 to this EIR). Notably, all diesel equipment owned by Rise Grass Valley Inc. would be equipped with Tier 4 Final engines, which feature the highest standard of emissions control technology. As with construction, the electrically powered equipment would not contribute to criteria air pollutants or TACs at the project sites but would result in GHGs associated with electricity generation. All underground equipment would be electrically powered."

Ind 831-23

Comment: This statement above regarding diesel engines appears throughout the Air Quality section of the DEIR and Appendix E-1, "*... all diesel equipment owned by Rise Grass Valley Inc. would be equipped with tier 4 Final engines."*…This section does not discuss the situation where the applicant uses contractors or other lessors of equipment that do not use Tier 4 Final engines. Nor do dispersion predictions show any data where Tier 3 engines were used.

Question: How will the applicant guarantee the use of Tier 4 Final engines regardless of who supplies the equipment? Will the applicant generate dispersion predictions assuming only Tier 3 engine usage to inform the public of the consequences of such usage?

Page 4.3-62

First paragraph - …*"Based on the PM_{10} emissions estimated, emissions of asbestos, silica, and heavy metals were estimated for purposes of health risk modeling."*

Ind 831-24

Question: Health Risk modeling appears to be based on estimates of estimates. How were the estimates of PM_{10} emissions obtained? What were the values for emissions of asbestos, silica, and heavy metals used for the Health Risk modeling? What is the confidence level of these values?

From Appendix E-1, Page 20, Section 2.4.2.1 Construction Emission

Ind 831-25

Note that the entries for Emergency Generators are assumed to be operated for 100 hours per year for testing and maintenance. The argument for this is that emergencies (PSPS outages) are not predictable and are speculative. As such the emissions can be left out of emission tabulations. However, the counter argument is made in the comments for **Appendix E-1** and are repeated here:

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From Appendix E-1, Page 57, Section 2.6 Emergency Generator use during PSPS

"Public Safety Power Shutoffs are infrequent (as an example, 9 days of power outages would be a conservative representation based on the Public Safety Power Shutoffs in recent years) and emergency generator use may not be needed at all during construction and/or years of operations. However, for disclosure, maximum daily emissions were estimated for 2,655 hp emergency generator usage during construction (two generators) and operations (four generators), assuming all emergency generators would operate for 24 hours per day. Emissions for the generators were estimated based on the exhaust emission data sheets for the representative Cummins model QSK60-G17, which are Tier 4 Final engines. Since the use of emergency generators is speculative and beyond the reasonable control of Rise Grass Valley, Inc., the emissions presented in Table 19 are for informational purposes only."

Comment: In the past two years power outages have occurred twice a year and have become predictable, as PGE should attest. Whenever valley winds are above a certain level, PGE institutes a PSPS that effects Nevada County even though the high winds and wind gusts are in areas far removed from our location. These winds are predictable in the Spring, Summer, and Fall, though the exact days are not. Rain and snow storms have caused power outages County wide for two weeks in some areas. Given these "real world" events, a conservative time span for generator usage would be of the order of two weeks a year – one week in Spring/Summer and one week in Fall/Winter and would require generator usage for a total of 336 hours per year. Emission results should include this usage and should not state this to be "speculative". These events will occur and are predictable during the year. The exact days and weeks during the year remain speculative. Power outage calculations should take into consideration the recent historical record of power outages.

Question: Will the emissions from emergency generator usage be removed from the "speculative" nature to a "predictable" nature and be included in the emission table as occurring throughout the year? Will PGE be contacted to acknowledge a predictable number of PSPS outages per year? What are the reasons not to include the generator emissions in the emission tables as predictable outages?

The DEIR should include power outages values based upon the average of the past three years and with consideration of the projected increased lengths and severities of the fire season.

NOTE: The following material has not been included in the DEIR. It is important that the Nevada County Lead Agency be aware of this information that spotlights the deficiencies of the DEIR. The final EIR must include this information to allow residents of Nevada County to fully appreciate how the IMM project will affect their lives. The Applicant Proposed Measures discussed are in indented text.

Ind 831-26

Page 4.3-65 Applicant Proposed Measures

In the **December 2020** edition of this Air Quality and GHG Emissions report, two Applicant Proposed Measures (APM) were added. These Applicant Proposed Measures are relevant to the air quality analysis and are presented below. This Impact Analysis assumes that all APMs would

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be implemented as conditions of approval, as defined below. However, neither one of these APM's have been carried forward to Appendix E-1 nor has any discussion or analyses been presented to explain or justify the removal of these APM's.

> *"**APM-AQ-3: Underground Fugitive Asbestos Dust Control.** Rise Grass Valley Inc. shall employ ventilation engineering controls systems for all mine headings where tunneling is taking place in serpentinite containing asbestos. The engineering controls will be designed to prevent asbestos fibers from exhausting from tunneling areas into the main ventilation system of the underground mine and consequently from being exhausted from the underground mine to the surface. Engineering controls could include air filtration, water curtains, or other methods designed to remove 90% of asbestos fibers."*

Comment: There is no discussion of the ventilation systems, engineering controls, filtration, or other methods used to mitigate the Asbestos exposure to mine workers or the above ground population. There is no discussion or analysis to verify that the solutions alluded to will remove 90% of Asbestos fibers. There is no analysis or discussion to explain how the remaining 10% of Asbestos fibers will be prevented from being exhausted from the headframe ventilation stack into the ambient environment.

Question: Why is the analysis and discussion to address the above issues not presented here? Where have the Health Risks been analyzed that used a range of values for Asbestos or silica? How sensitive are the Health Risks for slight changes in the amounts of Asbestos or silica? In other words, what are the safety factors in your results? How much confidence is there for the 90% Asbestos removal?

> *"**APM-AQ-4: Air Quality Monitoring.** Rise Grass Valley Inc. shall coordinate with the Northern Sierra Air Quality Management District to develop an appropriate air pollutant monitoring protocol to install and operate particulate matter monitoring equipment at an upwind and downwind location on the boundaries of the Brunswick and Centennial Industrial Sites."*

Comment: These two APM's are applicant proposed measures. However, their elimination implies that the applicant is no longer in favor of such measures. The Air Quality Monitoring measure needs to be implemented and to be in force before any construction activity is started. These monitoring stations must be operational in order to establish a baseline of pollution monitoring before and during construction and mining operations. Equipment should be installed to measure Ozone, PM2.5, PM10, SO2 and NO_x. There is no discussion in this report that explains why this APM has been removed and there is no information presented as to possible benefits to the IMM project or the surrounding environment that may be achieved by removing this APM.

(The value of such coordination with the NSAQMD has been verified by a personal communication between William Clark and Sam Longmire of NSAQMD on Feb 4, 2022.)

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Question: What are the reasons for removing this APM from the Air Quality and GHG Emissions Analysis report? How will Rise Gold monitor the project environment to provide information to analyze the effectiveness or lack thereof of the various mitigation plans proposed? What is the benefit to the applicant and the surrounding community for removing this APM?

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Pages 32-33, Section 2.4.2.4 Health Risk Assessment

> *"The TAC emissions associated with blasting and crushing, ore processing, and earthwork and material handling would include asbestos and silica emitted from the fugitive dust produced. The applicant estimates that the ore processed would be quartz veins hosted primarily within andesite rock and an assumed 60% silica content. The applicant has prepared an Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR Plan) which is designed to exclude asbestos containing material, serpentinite, or ultramafic rock from the engineered fill produced by the project (Rise Grass Valley Inc. 2021). The ASUR plan also is designed to prevent the emission of dust from the underground mine which contains asbestos. For conservatism in the modelling of TAC emissions, the materials mined and engineered fill are assumed to be composed of 1% serpentinite with an asbestos content of 0.25%, which is the detection limit for the bulk asbestos testing proposed in the ASUR plan. The average asbestos content of the total mined material, assumed at 0.0025%, is of primary concern since asbestos does not have established acute noncancer effects (OEHHA 2020). Therefore, only the average asbestos emissions that could be generated over the long-term (per year), and associated long-term health risk, has been evaluated herein. However, it should be noted that since mine operations would be required to comply with MSHA PELs that protect underground workers from asbestos fiber exposure during short-term shifts, this compliance would also result in limiting potential emissions of asbestos aboveground from the shaft in general."*

Ind 831-27

Comment: In the **March 2021** edition of the report the Asbestos content is assumed to be 0.0025%. In the **December 2020** version the value was 0.0108% based on lab results, not assumptions. There are no analyses presented to validate this assumption. There are no analyses or test results presented that justify assigning a value of 0.25% just because that is the detection limit for bulk testing. It is recognized that TEM testing is many times more sensitive to bulk testing yet this test method is not discussed here. Health Risk predictions must be called to question until this discrepancy is resolved. This Health Risk assessment must be repeated before the IMM project can proceed.

It is possible that these contradictions are the result of new and better data and/or analyses and the data presented in the DEIR represent the current project design. But without a paper trail or other explanations, this may be entirely speculative.

Question: What is the explanation for this major discrepancy? What assurances can the applicant provide that measurement methodologies will be accurate?

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Ind 831-28

"Blasting and crushing would also result in emissions of dust with trace heavy metal TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium. Concentrations of each heavy metal within the barren and mineralized rock was taken from Table 4-7 of the Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project (EMKO Environmental, Inc. 2020). Based on the PM10 emissions estimated, emissions of asbestos, silica, and heavy metals were estimated for purposes of the health risk modeling. As described in the ASUR Plan, the project would employ ventilation engineering controls systems for all mine headings where tunneling is taking place in serpentinite containing asbestos. The engineering controls will be designed to prevent asbestos fibers from exhausting from tunneling areas into the main ventilation system of the underground mine and consequently from being exhausted from the underground mine to surface. Engineering controls would include air filtration designed to remove 95% of asbestos fibers. Other emissions of TACs from blasting pertain to the combustion of ANFO, which were estimated based on emission factors from AB 2588 Combustion Emission Factors (Ventura County Air Pollution Control District 2001)."

Comment: In the **December 2020** edition of this report, engineering controls would be employed to remove 90% of asbestos fibers. This edition of the report states that filtration systems will remove 95% of asbestos fibers. However, there are no analyses or test results or demonstrated methods presented that validate either of these values. If this report is correct, 5% of asbestos fibers will exhaust via the headframe ventilation stack to the surrounding environment and will be spread around by the prevailing winds.

The ASUR Plan states that MERV-16 filters will be employed to filter 95% of fugitive Asbestos dust and fibers in the tunnels and stopes of the mine. An on-line source for MERV-16 filters states that the filters will filter 90% of particulate matter. It is not clear from the above discussion how these filters will filter to the 95% level.

Question: How will this contradiction be resolved? Will the applicant present test results to defend the capabilities of the MERV-16 filters? How will the remaining 5% of asbestos fibers be prevented from exhausting to the surrounding environment by the headframe ventilation stack?

Mitigation Measures Proposed in the DEIR

Pages 2-14 through 2-30, Table 2-1, 4.3 Air Quality, Greenhouse Gas Emissions, and Energy

Ind 831-29

4.3-1 Mitigations consist of Project Improvement Plans, Traffic Control, Construction Exhaust Emissions Minimization Plan, and use of Tier 4 diesel engines. There is no description of the contents of these plans, or who will monitor adherence to the plans or what enforcement mechanisms will be in place to ensure compliance. Also, there are loopholes which provide the applicant a way out of using Tier 4 diesel engines for project related equipment.

Ind 831-30

4.3-2 Mitigation is by an Asbestos Dust Mitigation Plan (ADMP). The mitigation measure does not mention the goals of the ADMP. Is it to "Prevent" Asbestos dust? Is it meant to "minimize" Asbestos dust, or is to "control" Asbestos dust? In the IMM project, words matter. Also, there is no discussion of who monitors the performance, or who enforces the performance requirements, or the enforcement mechanism proposed in the ADMP. For dust control, there are two options, wet the ground or suspend grading operations. This is a loophole to allow the applicant to continue operations in any event. More loopholes are presented for NSAQMD's participation in this mitigation measure. Words such as "may require bulk sampling at any time" and "may require air monitoring at any time" do not instill much confidence that this ADMP will be effective in controlling Asbestos dust. This mitigation measure must require bulk sampling and air monitoring as a basic part of the ADMP.

Ind 831-31

4.3-7 Mitigation of GHG emissions. There are two parts to this measure. One is to use non-diesel construction equipment to the extent commercially available. This is another loophole for the applicant to employ. This mitigation must include the preparation and approval of a "project equipment use plan" or some allied plan to state the aims of this measure and to allow approval on a case-by-case basis for deviations from the plan. The second part of this measure deals with the GHG construction emissions. The 8 pages of legalese that describe Carbon Offsets are extremely complicated to wade through. The GHG emissions exceed the yearly allowable values because the construction period is constrained to one year.

Additional Mitigation Measures for consideration

Ind 831-32

1.The Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan should be included as a Mitigation Measure to ensure adequate sampling and analyses are performed to minimize Asbestos dust, particulate matter, and fragments of Asbestos and Silica that occur during underground mining operations and then be exhausted to the environment by the headframe ventilation stack.

Ind 831-33

2.The Applicant Proposed Measure (APM) **Air Quality Monitoring** should be included as a Mitigation Measure**.** The measure states: "*Rise Grass Valley Inc. shall coordinate with the Northern Sierra Air Quality Management District to develop an appropriate air pollutant monitoring protocol to install and operate particulate matter monitoring equipment at an upwind and downwind location on the boundaries of the Brunswick and Centennial Industrial Sites.*"

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In the **December 2020** edition of this Air Quality and GHG Emissions report, this Applicant Proposed Measure (APM) was added. However, this APM has not been carried forward to the DEIR or Appendix E-1. This APM will ensure that pollutants that are dispersed into the environment from construction and mining operations will be monitored both before the start of construction and throughout the project timeline. This would be a safeguard to support, modify, or challenge Air Quality measurements and predictions that are currently based on analyses and modeling activities.

(The value of the applicant coordinating with the NSAQMD for additional pollution monitoring stations was verified in a personal communication between William Clark and Sam Longmire of NSAQMD on Feb 4, 2022.)

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INDIVIDUAL LETTER 831: WILLIAM CLARK (2)

Response to Comment Ind 831-1
This is an introductory comment. The commenter's specific comments are addressed below in Responses to Comments Ind 831-2 through 831-33.

Response to Comment Ind 831-2
The County acknowledges the comment as background information about the commenter. Comment noted.

Response to Comment Ind 831-3
The commenter questions why air pollutants from underground blasting and mining were not addressed in the DEIR. However, criteria air pollutants and toxic air contaminants associated with underground blasting and mining were estimated in the DEIR and mitigated where appropriate. Underground blasting and mining does not produce reactive organic gases (ROG) and constitutes a minor proportion of oxides of nitrogen (NO_x) emissions from the project (approximately 15 pounds per day), as depicted in Table 4.3-17 of the DEIR. The project incorporates design features to reduce exhaust from underground equipment, such as the exclusive use of electrically powered equipment underground per APM-AQ-1 (please see Master Response 19– NSAQMD Criteria Pollution Thresholds during Operations).

Asbestos and crystalline silica were accounted for in the Health Risk Assessment prepared for the project (see Appendix E.1 of the DEIR) and total potential health risk was determined to be less than significant after implementation of mitigation. Notably, Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in Mitigation Measure 4.3-2. The measures of the ADMP reduce the emissions of dust (PM_{10} and $PM_{2.5}$) as well as asbestos. The Health Risk Assessment is based on conservative assumptions, as described in Master Response 22 - Conservatism of Asbestos Assumptions, and Master Response 21 - Conservatism of Silica Assumptions.

Response to Comment Ind 831-4
The commenter asks how the applicant will address emissions of crystalline silica, and states that no analysis, test results or discussion was presented in the DEIR regarding silica health risk. Of note, crystalline silica was included in the emissions inventory incorporated into the Health Risk Assessment prepared for the project (see Appendix E.1 of the DEIR). As detailed in Master Response 21 - Conservatism of Silica Assumptions, the assumed crystalline silica content and modelling of respirable silica is conservative and overestimates the relevant exposure in any situation. As such, testing of rock from the project site for silica content could not result in a greater silica impact than was already assumed in the DEIR. Crystalline silica has potential chronic health risk values but no acute or cancer risk values have been established. As presented in Table 4.3-21 of the DEIR, the chronic health risk impact, which includes risk from crystalline silica, was determined to be less than significant without incorporation of mitigation. Finally, measures that reduce fugitive dust, such as APM-AQ-2 (Surface Fugitive Dust Controls), will also reduce potential emissions of crystalline silica.

Response to Comment Ind 831-5
The commenter states that the ambient air pollutant monitoring stations and data provided in the DEIR are not representative of the project site. However, the commenter does not suggest any stations that would have data more representative of the project site. Of note, the ambient data

included in Table 2 in Appendix E.1 of the DEIR, and summarized in Table 4.3-4 of Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR, are provided only as context for the existing local ambient air quality and are not used as inputs into the air quality model. Significance determinations, however, are based on comparison to the NSAQMD thresholds, not comparisons to local ambient levels. As discussed on page 4.3-41 of the DEIR, the NSAQMD has established thresholds of significance for CEQA purposes to achieve and maintain the National and California Ambient Air Quality Standards (AAQS). Because an AAQS is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the AAQS, a project that complies with the thresholds established by a local air district, such as the NSAQMD, would not result in adverse effects to human health related to criteria pollutant emissions, which were developed based on compliance with the applicable AAQS. Regarding emissions quantification, the DEIR employed industry standard and vetted approaches and quantification equations, such as factors developed by the United States Environmental Protection Agency (EPA) in the AP-42 Compilation of Air Emissions Factors and by the California Air Resources Board (CARB) in the OFFROAD and EMFAC models. The assumptions and factors incorporated in the analysis are detailed in "Method of Analysis" section of Chapter 4.3 of the DEIR, starting on page 4.3-44.

Response to Comment Ind 831-6

The commenter questions the percent reduction validity of the fugitive dust mitigation measures employed in the DEIR. The majority of dust emissions are derived from factors from the Environmental Protection Agency's AP-42 Compilation of Air Emissions Factors and noted in the tables of Appendix E.1. A reduction of dust from vehicle traffic on unpaved access roads and unpaved compaction areas by 55% is based on the California Emissions Estimator Model (CalEEMod) 2016.3.2, which is based on data compiled by the South Coast Air Quality Management District and the *WRAP Fugitive Dust Handbook* (2006). As described in the CalEEMod User's Guide (2017):

> The purpose of CalEEMod is to provide a uniform platform for government agencies, land use planners, and environmental professionals to estimate potential emissions associated with both construction and operational use of land use projects. It is intended that these emission estimates are suitable for quantifying air quality and climate change impacts as part of the preparation of California Environmental Quality Act (CEQA) documents. In addition, individual districts may rely on the model's emission estimates to show compliance with local agency rules.
>
> CalEEMod utilizes widely accepted methodologies for estimating emissions combined with default data that can be used when site-specific information is not available. Sources of these methodologies and default data include but are not limited to the United States Environmental Protection Agency (USEPA) AP-42 emission factors, California Air Resources Board (CARB) vehicle emission models, studies commissioned by California agencies such as the California Energy Commission (CEC) and CalRecycle. In addition, some local air districts provided customized values for their default data and existing regulation methodologies for use for projects located in their jurisdictions. When no customized information was provided and no regional differences were defined for local air districts, then state-wide default values were utilized.

Note that reduction of dust of 80% from use of chemical dust suppressants was not applied to vehicle traffic on unpaved access roads during operations for purposes of the air quality analysis and therefore adds significant conservatism to the modelled emissions during operations. Please see Master Response 12 – Chemical Dust Stabilizers for information on the effectiveness and composition of chemical stabilizers.

Response to Comment Ind 831-7

The commenter suggests that Public Safety Power Shutoffs (PSPS) are predictable and that emissions from emergency generators should be accounted for. Given that it is unknown if/ when a PSPS would occur, it is considered a speculative event, and per the CEQA Guidelines, if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145). California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst-case scenario." (see Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 373.). The use of emergency generators is speculative and beyond the reasonable control of the applicant. However, criteria air pollutant emissions associated with 24-hour operation of the emergency generators is provided in Table 4.3-25 of the DEIR on page 4.3-104 for informational disclosure purposes only.

Response to Comment Ind 831-8

The Base Elevation for STCK8, STCK9, STCK10 shown in Table 2 are in feet. The units shown as meters is an error (typo) in the table. This can be verified in the model output files on page 395 of the document where these stacks are shown at elevations of 837.71, 838.72, and 759.39 meters. The correct elevation values were used in the dispersion model. For STCK 8, generators, the gas exit temperature, velocity, and flow rate are based on data provided by the manufacturer of the generators. SLINE1 through SLINE9 are correctly stated in Table 2 according to what was modeled in the HRA. No changes to SLINE1 through SLINE9 are needed.

Response to Comment Ind 831-9

The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA. The rural dispersion was selected based on the land use procedure as defined by the EPA Guideline on Air Quality Models – Appendix W. As less than 50% of the land within 3 km radius of the project site is categorized as I1 (heavy industrial), I2 (light-moderate industrial), C1 (commercial), R2 (compact residential), and R3 (compact residential), it is appropriate to use the rural option. The terrain characteristics used for the site are the most well-defined in terms of elevation details available within the AERMOD model. As such, the terrain used is accurate and appropriate for the assessment.

Response to Comment Ind 831-10

The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA. Please also see Response to Comment Ind 831-9 above for a discussion on the terrain characteristics and use of the rural option. It is not appropriate to model the site as urban as discussed above, regardless of Grass Valley becoming more urban. Please see Response to Comment Ind 831-8 regarding the alleged errors in Table 2. Furthermore, the use of the rural dispersion option is conservative compared to urban. To account for the dispersive nature of the "convective-like" boundary layer that forms during nighttime conditions due to the urban heat island effect, AERMOD enhances the turbulence for urban nighttime conditions over that which is expected in the adjacent rural, stable boundary layer, and also defines an urban boundary layer height to account for limited mixing that may occur under these conditions. The magnitude of the urban heat island effect is driven by the urban-rural temperature difference that develops at night.

Response to Comment Ind 831-11

The commenter questions why solar energy was not proposed to mitigate energy consumption of the project and points to the Nevada County Energy Action Plan (EAP) reduction goals. The project does not have a significant impact with regard to energy use; therefore, mitigation is not

required. Regarding a solar energy system, while solar panels are not currently proposed as part of the project, the roof space of the project buildings may be available in the future for installation of solar panels to reduce the project's reliance on the energy grid. However, any such solar power generation would be small in comparison to the requirements of the project. Notably, the GHG emissions presented in the DEIR are conservative, since California regulations will reduce GHG emissions over time. For instance, Senate Bill 100 requires that zero carbon energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis. Further, compliance of the project with EAP strategies has been analyzed in Table 4.3-22 in the DEIR and was determined to be consistent with the EAP. Please see also Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Ind 831-12

The commenter suggests that GHGs associated with the manufacture of cement should have been included in the DEIR. This comment pertains to a "lifecycle" analysis, which is not required under CEQA. Please see Master Response 26 – Life Cycle GHG emissions.

Response to Comment Ind 831-13

The commenter identifies differences between the analysis in the DEIR and a draft version of the Air Quality and GHG Report. Notably, the DEIR is based on the most recent Air Quality and GHG Report (dated November 2021) included as Appendix E.1 of the DEIR. Draft versions of this report created before the issuance of the DEIR are not relevant to the analysis.

The commenter states that the DEIR does not discuss ventilation controls, filtration, or other methods used to mitigate exposure of workers or the public to asbestos. However, Chapter 4.3 and Appendix E.1 and E.2 of the DEIR provides extensive discussion and analysis of these issues. Also see Master Response 21 - Conservatism of Silica Assumptions and Master Response 22 - Conservatism of Asbestos Assumptions. The efficiency of proposed underground filtration, including evidence of effectiveness, is provided on page 10 of Appendix E.2. Also see Response to Comments 8-133 and 8-151 in CEA letter #1.

Response to Comment Ind 831-14

The commenter identifies differences between the analysis in the DEIR and a draft version of the Air Quality and GHG Report. Please see Response to Comment Ind 831-13 above.

Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The prior draft of the Air Quality and GHG report included different measures, but these were removed because the same emissions impacts are reduced by the ADMP requirement.

Response to Comment Ind 831-15

The commenter identifies differences between the analysis in the DEIR and a draft version of the Air Quality and GHG Report. Please see Response to Comment Ind 831-13 above.

The Health Risk Assessment included in the DEIR uses TEM testing which is discussed in detail in Chapter 4.3 and Appendix E.1 and E.2 of the DEIR. Also see Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 831-16

The commenter identifies differences between the analysis in the DEIR and a draft version of the Air Quality and GHG Report and questions the efficiency of proposed air filtration proposed in the ASUR Plan. Please see Response to Comment Ind 831-13 above.

Response to Comment Ind 831-17

The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA. In addition, as shown in the Master Response, the prevailing wind direction in Grass Valley is from the northeast. The meteorological data includes six years of data, 24 hours per day, 365 days per year, which includes periods of calm. As such, periods of very stable air as indicated by the commenter would have been accounted for in the meteorological data used in the HRA. The discussion regarding meteorological data in the HRA report discussed the nearest stations available for use in modeling and how they differ compared to the windrose in Grass Valley. This is discussed in more detail in Master Response 17 - Meteorological Data Used in HRA.

Response to Comment Ind 831-18

This comment is a duplicate of Comment Ind 831-4. Please see Response to Comment Ind 831-4.

Response to Comment Ind 831-19

This comment is a duplicate of Comment Ind 831-5. Please see Response to Comment Ind 831-5.

Response to Comment Ind 831-20

The commenter asserts that the Project Applicant should be required to disclose the project's plans to comply with the California Executive Order (EO) N-79-20, which establishes a Statewide goal that 100 percent of in-state vehicle sales of new passenger cars and trucks shall be zero-emission by the year 2035. The applicant, as well as everyone in California, will purchase vehicles that are available at the time of that future transaction, which will meet the standards that are required based on the date of manufacture. However, as technology and fleet turnover for passenger cars and trucks transitions to cleaner battery-electric vehicles over time, GHGs in the state will reduce proportionally, which will also result in reductions in the GHGs presented in the DEIR for the project.

Response to Comment Ind 831-21

The commenter asks about the various ventilation fans proposed for the project. The project includes 3 main ventilation fans, 2 booster ventilation fans, and 10 auxiliary ventilation fans. All fans would be located underground once the service shaft is constructed. The fans will be sized and placed as needed to provide ventilation flows throughout the mine. These specifications will change depending on where mining is taking place. The engineering details of the ventilation fans is not necessary for an EIR. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26.)

Response to Comment Ind 831-22

This comment is a duplicate of Comment Ind 831-6. Please see Response to Comment Ind 831-6.

Response to Comment Ind 831-23

The commenter questions how the applicant will ensure the use of Tier 4 equipment and whether dispersion modeling was performed for Tier 3 equipment. The project analysis incorporates

applicant proposed measures (APMs) that serve to reduce project emissions of criteria air pollutants and toxic air contaminants, including APM-AQ-1 that states "all off-road diesel-fueled equipment and emergency generators owned by Rise Grass Valley Inc. shall be equipped with Tier 4 Final engines" (DEIR page 4.3-65). APMs are mandatory conditions of approval and are enforceable by the County. Please see Master Response 3 – Operator Responsibility.

Regarding construction contractors, Mitigation Measure 4-3-1(b) requires a Construction Exhaust Emissions Minimization Plan and the use of Tier 4 Final engines or alternative sources of power. As such, use of Tier 4 engines or alternative sources of power are required even for contractors. The mitigated emissions presented in the Air Quality Analysis of the DEIR reflect the lower emissions that would be achieved by this mitigation measure. A comparison of mitigated and unmitigated emissions of criteria air pollutants and risk from toxic air contaminant exposure is already provided in the DEIR (see Tables 4.3-17, 4.3-19, and 4.3-21) and may be reviewed by the commenter to understand the consequences of using lower tier engines during construction.

Response to Comment Ind 831-24

The commenter expresses concerns that asbestos, silica, and heavy metals are "estimates of estimates". Given that asbestos, silica, and heavy metals are part of the fraction of fugitive dust considered PM_{10} (particulate matter with an aerodynamic diameter less than or equal to 10 microns), the potential mass of these toxic air contaminants needs to be estimated based on the individual proportions therein. This is standard industry practice. The assumptions used to estimate PM_{10}, asbestos, silica, and metals are provided in Appendix E.1 of the DEIR. Please also see Master Response 21 - Conservatism of Silica Assumptions, Master Response 20 - Conservatism of Metals Assumptions, and Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 831-25

This comment is a duplicate of Comment Ind 831-7. Please see Response to Comment Ind 831-7.

Response to Comment Ind 831-26

This comment is a duplicate of Comments Ind 831-13 and 831-14. Please refer to these responses.

Response to Comment Ind 831-27

This comment is a duplicate of Comment Ind 831-15. Please see Response to Comment Ind 831-15.

Response to Comment Ind 831-28

This comment is a duplicate of Comment Ind 831-16. Please see Response to Comment Ind 831-16.

Response to Comment Ind 831-29

The commenter asserts that Mitigation Measures 4.3-1(a) and 4.3-1(b) do not contain adequate descriptions of plans, monitoring, enforcement mechanisms, and also that loopholes are provided for use of Tier 4 engines. Contrary to commenter's assertion, sufficient detail is provided in Mitigation Measures 4.3-1(a) and 4.3-1(b) to allow for enforcement, and development of any required subsequent plans (such as a Construction Exhaust Emissions Minimization Plan). A mitigation monitoring and reporting plan is included as part of the FEIR (Chapter 4), and will be used by the County to enforce all mitigation measures and conditions of approval. Please see Response to Comment Ind 831-23 regarding the alleged loophole in use of Tier 4 engines.

Response to Comment Ind 831-30

The commenter asserts that there are "loopholes" in the Asbestos Dust Mitigation Plan (ADMP). Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to NSAQMD for review and approval and is directly transcribed from the *Asbestos Dust Mitigation Plan Guidelines* (2004) provided by the NSAQMD as "a template for an approvable ADMP". The NSAQMD is responsible for enforcing the ADMP, and the NSAQMD has authority over whether air monitoring will be required.

Response to Comment Ind 831-31

The commenter asserts that Mitigation Measure 4.3-7(a) includes a loophole because it only requires the use of electrical or alternative fueled construction equipment "where feasible." This is a standard GHG mitigation measure used to help reduce GHG emissions through use of available non-diesel technology. However, the availability of non-diesel construction equipment is a changing landscape, so it would be infeasible to require the mine operator to use all non-diesel equipment, when such equipment may not yet be commercially available. Moreover, the mitigated GHG emissions presented in the DEIR did not assume any specific reductions based on this general requirement to use non-diesel equipment when feasible, so the DEIR presents a conservative analysis (see pages 131 through 136 of Appendix E.1 of the DEIR). The commenter also asserts that Mitigation Measure 4.3-7(b) is too long and complicated. The carbon offset requirement in Mitigation Measure 4.3-7(b) needs to contain this level of detail to comply with legal precedent from California Courts, and to ensure that the mitigation measure is effective in mitigating impacts. The commenter notes that the GHG emissions for construction exceed the GHG constructions emissions thresholds because the construction period is constrained to one year. To provide the most conservative estimate of project construction emissions, many construction tasks were assumed to occur simultaneously, while in reality, they may be performed in sequence. Please see Master Response 24 - Project Construction Schedule.

Response to Comment Ind 831-32

The commenter asserts that the ASUR Plan should be included as a mitigation measure. The ASUR Plan is included as APM-AQ-3 in the DEIR and is required as a condition of approval of the project, which means that the County will have enforcement authority similar to a mitigation measure. In addition, Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to the NSAQMD for review and approval. Components of the ASUR Plan will become part of the approved ADMP and other components will be used as company policy and procedures to assist with compliance with the ADMP.

Response to Comment Ind 831-33

This comment is a duplicate of Comment Ind 831-14. Please see Response to Comment Ind 831-14.

Individual Letter 832

County of Nevada
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-8617

March 29, 2022

To: Matt Kelley, Senior Planner

Subject: Comments on the Idaho-Maryland Mine Project DEIR Appendix E-2

Comments submitted by William Clark
324 Vistamont Dr.
Grass Valley, Ca. 95945

DEIR Document

Appendix E-2: Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan

SUMMARY

With respect to Air Quality concerns, the IMM project design has undergone a series of evolutions as described in earlier editions of Air Quality technical reports. Unfortunately, design modifications, changes, and updates have not been presented in a manner that is transparent to a reviewer to understand and critique the evolving design and environmental impacts. The following comments identify specifics of the IMM design as described in the Appendix E-2 and also question some changes and omissions that have been carried forward to the current document.

Without additional information and supporting analyses for key elements of this report, this reviewer cannot declare the ASUR Plan to be both adequate and representative of a final project design with respect to minimizing Asbestos contamination.

Direct quotes are presented in Italics. In certain instances, information from earlier "editions' of Air Quality reports are included to illuminate areas in question and this information is in indented text.

Ind 832-1

QUALIFICATIONS

William Clark is a 21year resident of Grass Valley and a retired Aerospace Engineer with a Masters Degree in Systems Analysis/Electrical Engineering. His experience has been in all aspects of Systems Analysis, Systems Integration, Modeling and Design for Avionic systems and Spacecraft. He has conducted and supported Design Reviews in response to proposals from Military, Scientific, Commercial, and NASA customers.

Ind 832-2

Mr. Clark also served several terms as a member of the Nevada County Civil Grand Jury and was involved in the analysis and publication of a report on the Air Quality in Nevada County (2003).

1

Appendix E-2, ASUR Management Plan November 2021

COMMENTS

Page 4, Section 4.0 - Overview
Page 7, Section 5.0 - Testing
Appendix C - Sampling

Ind 832-3

Comment: Rise owns 2,585 acres of sub-surface mineral rights and has only completed 19 exploration drill holes over a two-year period. Samples were taken from 6 of the 19 total cores drilled. It appears that the acreage within the mineral rights was undersampled in terms of surveying possible areas containing Asbestos. And sampling 32% of the cores drilled seems a paltry sum to claim the mining project is largely Asbestos free. These facts are coupled with the lack of discussion of why this sampling program was chosen to assess the distribution of ore that contains Asbestos.

Question: Given that Asbestos is a widely recognized toxic element and given that Rise had two years to survey and drill, what is the reason that a more robust sampling program was not undertaken? Will there be additional data presented in the EIR to justify this sampling approach?

Page 5, Section 4.1.2

"To provide access to the gold mineralization, an extensive network of tunnels and raises will be constructed throughout the life of the mine. These tunnels are constructed in the nonmineralized rock which, at the mine, is typically meta-andesite volcanic rock. The tunnels are constructed in 10-foot advances per blast (a "round"). Parallel holes are drilled into the rock face, loaded with explosives, and then detonated to fragment the rock. The broken rock is moved to the surface, the tunnel is supported with rock bolts and screen, and then the process starts again to continue advancing the tunnel. A number of tunnels will be under construction throughout the mine area at all times during the life of the mine.

Ind 832-4

New underground tunnels and raises will be created as necessary to access gold-quartz veins or provide the necessary underground infrastructure to transport rock and provide ventilation and escape routes.

Mine development in nonmineralized "barren" rock (i.e., nongold bearing) is expected to result in the production of approximately 500 tons per day (182,500 tons per year) of barren rock. The barren rock will be transported from the tunnel face to the mine shaft (using electric powered load/haul/dump vehicles, rail cars, and/or conveyors) to underground rock bins located adjacent to the shaft. The rock will then be loaded into the shaft skips, hoisted to the surface, and dropped into one of the compartments of the concrete silo located on the surface. The barren rock will then be transported by trucks on the surface for user as engineered fill."

2

Page 5, Section 4.1.3
"Gold mineralization production through tunneling and long-hole blasting produces 1,000 tons per day (365,000 tons per year) of mineralized material. Approximately 50 percent of the mineralization will be returned to the underground mine as backfill after processing and the remainder of the sand tailings will be used for engineered fill."

Comment: For tunneling, I assume the tunnels will be of the order of 7 feet by 8 feet or 56 sq feet in area. Then each "round" of 10 feet into the rock will result in 560 cubic feet of broken rock. Assuming a nominal density of rock, that amounts to 90,720 pounds of rock, or 45.36 tons per "round". Using those numbers, it will take 11 "rounds" to produce 500 tons of barren rock. This would be the result of one 12 hour shift. The 500 tons will be hoisted up into the silo to wait for another 500 tons of barren rock produced somewhere else in the mine to be hoisted up. At this point, someone will take 3 "grabs" of rock for PLM/TEM testing before the rock is sent off on a truck. This is a possible scenario which attempts to put some real world data into the ASUR sampling Plan. The Plan fails to state how long the two tests will take – the testing itself is not instantaneous and no time span has been presented for the testing period.

For mineralization production, the time scale would be somewhat different but the questions are the same. The EIR must have a more definitive presentation of each step in this testing process.

Question: Does the 1000 tons of rock sit in the silo until the decision is made whether to send the rock to be used as Engineered Fill or to sequester the rock somewhere else? What about the next load of 500 tons coming up the shaft from some other tunnel in the mine? Who is the "Traffic Cop" in this process? Will the EIR have a more definitive presentation of this process?

Page 8, Section 6.0
Comment: This section lists several "plans" that include the following:
Engineered Fill Placement Plan, Mine Plan and, Operational Plan. None of these plans is discussed in detail, no authors are identified, and no approval mechanism or enforcement process is described.

"An Asbestos inventory of all mined materials will be maintained and include a current 3-month rolling average of Asbestos content in equivalent PCM units." There is no discussion or analyses presented that defends the use of a 3-month rolling average of Asbestos content. There is no information regarding the benefits of using such an average for this toxic element. This scheme uses monthly averages of Asbestos averages from the testing process in the silo. At 1000 tons of rock per day, many, many tons of rock go by before an average is calculated.

Ind 832-5

Question: Will above plans be described further in the EIR? Will a time frame be presented for the review and approval process of each plan? Will the EIR include information that explains the details of using the 3-month rolling average of Asbestos content? What are the benefits of using this type of averaging? Will the test results of this "bulk sampling" be used to determine the fate of each 1000 ton batch of rock?

3

Page 14, Section 8.1
"7. Records of all analytical test work conducted will be retained for the life of the operation or a minimum of 7 years."

Ind 832-6

Comment: Given the toxicity of Asbestos, records of all analytical test work must be retained for the life of the project operation.

Question: Will the EIR specify that such records must be retained for the life of the project operation?

NOTE: The following material has not been included in the DEIR. It is important that the Nevada County Lead Agency be aware of this information that spotlights the deficiencies of the DEIR and the ASUR Plan. The final EIR must address this information to allow residents of Nevada County to fully appreciate how the IMM project will affect their lives.

Air Quality & GHG Emissions Analysis & Technical Report – MARCH 2021

Pages 32-33, Section 2.4.2.4 Health Risk Assessment

Ind 832-7

> *"The TAC emissions associated with blasting and crushing, ore processing, and earthwork and material handling would include asbestos and silica emitted from the fugitive dust produced. The applicant estimates that the ore processed would be quartz veins hosted primarily within andesite rock and an assumed 60% silica content. The applicant has prepared an Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR Plan) which is designed to exclude asbestos containing material, serpentinite, or ultramafic rock from the engineered fill produced by the project (Rise Grass Valley Inc. 2021). The ASUR plan also is designed to prevent the emission of dust from the underground mine which contains asbestos. For conservatism in the modelling of TAC emissions, the materials mined and engineered fill are assumed to be composed of 1% serpentinite with an asbestos content of 0.25%, which is the detection limit for the bulk asbestos testing proposed in the ASUR plan. The average asbestos content of the total mined material, assumed at 0.0025%, is of primary concern since asbestos does not have established acute noncancer effects (OEHHA 2020). Therefore, only the average asbestos emissions that could be generated over the long-term (per year), and associated long-term health risk, has been evaluated herein. However, it should be noted that since mine operations would be required to comply with MSHA PELs that protect underground workers from asbestos fiber exposure during short-term shifts, this compliance would also result in limiting potential emissions of asbestos aboveground from the shaft in general."*

Comment: In the **March 2021** edition of the report the Asbestos content is assumed to be 0.0025%. In the **December 2020** edition the value was 0.0108% based on lab results, not assumptions. There are no analyses presented to validate this assumption. There are no analyses or test results presented that justify assigning a value of 0.25% just because that is the detection limit for bulk testing. It is recognized that TEM testing is many times more sensitive to bulk

testing yet this test method is not discussed here. Health Risk predictions must be called to question until this discrepancy is resolved. This Health Risk assessment must be repeated before the IMM project can proceed.

It is possible that these contradictions are the result of new and better data and/or analyses and the data presented in the DEIR and ASUR Plan represent the current project assessment. But without a paper trail, results of current analyses, or other explanations, this may be entirely speculative.

Question: What is the explanation for this major discrepancy? What assurances can the applicant provide that measurement methodologies will be accurate?

Ind 832-8

> *"Blasting and crushing would also result in emissions of dust with trace heavy metal TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium. Concentrations of each heavy metal within the barren and mineralized rock was taken from Table 4-7 of the Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project (EMKO Environmental, Inc. 2020). Based on the PM10 emissions estimated, emissions of asbestos, silica, and heavy metals were estimated for purposes of the health risk modeling. As described in the ASUR Plan, the project would employ ventilation engineering controls systems for all mine headings where tunneling is taking place in serpentinite containing asbestos. The engineering controls will be designed to prevent asbestos fibers from exhausting from tunneling areas into the main ventilation system of the underground mine and consequently from being exhausted from the underground mine to surface. Engineering controls would include air filtration designed to remove 95% of asbestos fibers. Other emissions of TACs from blasting pertain to the combustion of ANFO, which were estimated based on emission factors from AB 2588 Combustion Emission Factors (Ventura County Air Pollution Control District 2001)."*

Comment: In the **December 2020** edition of this report, engineering controls would be employed to remove 90% of asbestos fibers. The ASUR Plan states that filtration systems will remove 95% of asbestos fibers. However, there are no analyses or test results or demonstrated methods presented that validate either of these values. If this report is correct, 5% of asbestos fibers will exhaust via the headframe ventilation stack to the surrounding environment and will be spread around by the prevailing winds.

The ASUR Plan states that MERV-16 filters will be employed to filter 95% of fugitive Asbestos dust and fibers in the tunnels and stopes of the mine. An on-line source for MERV-16 filters states that the filters will filter 90% of particulate matter. It is not clear from the above discussion how these filters will filter to the 95% level.

Question: How will this contradiction be resolved? Will the applicant present test results to defend the capabilities of the MERV-16 filters? How will the remaining 5% of asbestos fibers be prevented from exhausting to the surrounding environment by the headframe ventilation stack?

5

INDIVIDUAL LETTER 832: WILLIAM CLARK (3)

Response to Comment Ind 832-1

This is an introductory comment. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. Comment noted.

Response to Comment Ind 832-2

The County acknowledges the comment as background information about the commenter. Comment noted.

Response to Comment Ind 832-3

The commenter questions the sampling approach conducted by the applicant. Rise completed 19 exploration drill core holes, totaling 67,500 linear feet, from 2017-2019. Exploration drilling was designed to test a variety of mineralization throughput the deposit in areas where mining is expected to occur. Notably, prior to underground gold mining, intensive planning efforts will be required to meet state and federal regulations and achieve safety, environmental, and economic goals. Underground mine planning includes exploratory drilling, geologic mapping, material logging, and testing of additional material before mining in a given area commences. These same processes also ensure future mining operations avoid and manage rock types that may contain naturally occurring asbestos. Please see Section 6.0 of the ASUR Plan (Appendix E.2 of the EIR).

Regarding asbestos health risk, the Health Risk Assessment prepared for the project (see Appendix E.1 of the DEIR) is based on conservative assumptions, as described in Master Response 22 – Conservatism used for Asbestos Assessment. However, as described in the DEIR on page 4.3-80:

> Pursuant to the CARB ATCM for Construction, Grading, Quarrying and Surface Mining Operations, an ADMP is required to be submitted to the NSAQMD for any project with greater than one acre of surface disturbance if any portion of the area to be disturbed is mapped as having serpentine or ultramafic rock or if any portion of the area to be disturbed has naturally-occurring asbestos, serpentine or ultramafic rock as determined by the owner/operator or the Air Pollution Control Officer. Because asbestos was found to be present in some of the underground mining material samples that Rise Grass Valley Inc. sent for laboratory analysis, an ADMP is required to be implemented to reduce potential asbestos exposure and protect public health.

The DEIR concluded that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and required preparation of an ADMP per Mitigation Measure 4.3-2 to reduce the impact to a less than significant level. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

In summary, the sampling conducted by Rise will continue to occur prior to, and during, underground gold mining as part of the rigorous mine planning to meet state and federal regulations and any potential asbestos emissions will be minimized through implementation of the ADMP, as described in Mitigation Measure 4.3-2.

Response to Comment Ind 832-4

The commenter questions the efficacy of asbestos testing described in the ASUR Plan based on the mass of rock generated during underground mining. Two methods of asbestos testing (PLM and TEM) are required under the ASUR Plan. PLM testing is required to comply with the Asbestos ATCM for Surfacing and trucks may not transport material without a receipt based on the PLM results. Accordingly, in response to the commenter's question about timing, the PLM testing would be conducted prior to transport of rock material from the site. Any materials with detectable asbestos would not be allowed to be used for surfacing. Barren rock and mineralized rock would be analyzed separately in order to allow the issuance of the required receipt. Barren and mineralized rock are placed in different bins of the silo. The Engineered Fill Placement (EFP) Plan (Section 8.5 of the ASUR Plan) will include schedules and planned material placement locations and haul roads. The EFP Plan will be designed to ensure that Asbestos Containing Material is not used for surfacing. The EFP Plan will designate areas which are suitable for the placement of Asbestos Containing Material and maintain an estimate of the capacity of these areas.

The purpose of TEM testing in the ASUR Plan is not to control the fate of the rock and tailings after it reaches the surface (that is the purpose of the PLM testing, as described above). The Asbestos Inventory (Section 8.3 of the ASUR Plan) based on asbestos content, using TEM testing, is to verify that mine planning is effectively minimizing the potential for public exposure to airborne asbestos from the project.

Response to Comment Ind 832-5

The plans referred to by the commenter are internal plans of the project operators, which are utilized to ensure compliance with the Asbestos Dust Mitigation Plan required for the project. As discussed on page 4.3-61 of the DEIR, the average asbestos content of the total mined material is of primary concern given that asbestos does not have established acute noncancer effects. Health risk from asbestos is calculated on an annual average exposure. Therefore, the assumption of a 3-month rolling average in the ASUR Plan is conservative. However, it should also be noted that the CARB ATCMs that pertain to naturally occurring asbestos are the overarching regulations with which the project is required to comply. The ASUR Plan was developed to be consistent with the ATCMs; however, the ASUR Plan does not supersede requirements contained within the ATCMs.

Response to Comment Ind 832-6

The commenter asserts that asbestos testing records described in the ASUR Plan should be retained for the life of the project. Of importance, the ASUR Plan is intended to reflect the requirements of the CARB ATCMs that were attached to the ASUR Plan and the project would retain records pursuant to these ATCM requirements, as follows:

Section (e)(5)(A) of the Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations requires the maintenance of certain records (including air monitoring) for 7 years following the completion of construction or grading operations. Section (f)(5)(A) of the ATCM requires the owner/operator of a surface mining or quarrying operation to maintain certain records (including air monitoring) for at least 7 years.

Section (e) of the Asbestos ACTM for Surfacing requires receipts (verifying the asbestos content) to be retained for a minimum period of seven years from the date of supply or use of the material.

Response to Comment Ind 832-7

This comment is a duplicate of Comment 15 in Individual Letter 831. See Response to Comment Ind 831-15.

Response to Comment Ind 832-8

This comment is duplicate of Comment 16 in Individual Letter 831. See Response to Comment Ind 831-16.

Individual Letter 833

Matt Kelly, Senior Planner
Nevada County Planning Department

3-30-2022

RE: Idaho-Maryland Mine Project DEIR
Rise Gold Grass Valley, Ca request for Rezoning, Use Permit, Reclamation Plan

To whom it may concern:

Ind 833-1 My wife and I have lived in western Nevada County for the the past 41 years and have taught in our local schools. We have raised our family here, our kids went to school here, and they have moved back here to live and work in our community and enjoy our Sierra mountain communities. We have seen and read about the failure of many mining projects, both in the past decades and historically. These mining projects left major environmental damage behind, both above and below ground.

The Draft EIR seems to be a well written document with many pages of information that rely on speculations and assumptions. The hypothetical charts, graphs, and computer models seem nice, but they are just speculative guesses.

Ind 833-2 The environmental areas are just incomplete in many areas, such as:
*Air quality: which is currently poor to fair in our area because of the high ozone up from Sacramento and the smoke from the fires. The mining equipment, especially the large truck traffic and heavy mining equipment will make it worse.

Ind 833-3 * Water quality: The EIR is low on testing results and very quiet on the damage that will be caused by 100s of millions of gallons of water being pumped out of the mine, and during a drought right now. Also, what is going to happen to the underground geology with the loss of this stabilizing water and loss of water to surface wells? The EIR is very quiet on mitigation surrounding this topic.

Ind 833-4 * Hazardous materials: These are a major problem. Take the materials such as very dangerous explosives and extraction chemicals. If there were any spillage or accidents, (which seem to happen with these operations), there will be not only pollution to waterways, but a very high risk factor to surface real estate. The mine has no buffer zone around its perimeter.

Ind 833-5 *Other problems: such as hazardous rock materials and the excessive 100+ trips a day of large trucks and other large industrial equipment used to move massive amounts of toxic and non toxic rock material. The truck transportation issue alone will cause damage to roads and create excessive exhaust pollution, dust and noise. These are just a few of the high environmental impact items that a mine brings with its daily operations. The EIR is very short on any written mitigations solutions to these impacts.

Ind 833-6 Unfortunately, when Ben Mossman, President of Rise Gold, states that the EIR speaks for itself, and states that there are "no significant impacts" (The Union, March 22, 2022), we have a huge problem. As we see it, the number one problem with the Rise Gold holdings of 190 surface acres that allow entry to the Idaho Maryland mine and the footprint of the 2585 acres of mineral rights that came with it, hold hostage and impact

the above ground developed real estate found within this acreage, which is worth100s of million dollars. This is just wrong for all of us.

Ind 833-7

As we know from past observation of our local mining history, the mining industry created toxic and hazardous mining remains throughout our county. An in-town mine, located between our two wonderful cities, will bring great risks and profound environmental damage to the central section of our communities that we live in with critical infrastructure that shouldn't be compromised. We should be very concerned about this potential environmental and economic disaster for western Nevada County.

Ind 833-8

The Board of Supervisors need to VOTE NO to any form of use permits to these types of risky projects. VOTE NO to any form of dewatering of our ground water reserves, especial during a drought, and VOTE NO on zoning changes. PLEASE stop the hostage taking of developed real estate by these dangerous and archaic mineral rights, that seem to be shopped around to be exploited by questionable mining ventures. It is time to stop this hostile business practice. The mineral rights need to be purchased by Nevada County or some nonprofit to stop this endless cycle. We need to protect our community from these present and future mining proposals, which bring major risk to our environment and quality of life.

Sincerely,

William and Linda Culbertson
14553 Echo Ridge Drive
Nevada City, Ca 95959
530 205 7138

INDIVIDUAL LETTER 833: WILLIAM AND LINDA CULBERTSON

Response to Comment Ind 833-1
The comment is an introductory statement that does not identify any specific concerns or inadequacies in the DEIR.

Response to Comment Ind 833-2
Please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, for further information related to air quality, including impacts related to ozone (ROG and NO_X) and smoke (particulate matter).

Response to Comment Ind 833-3
Please refer to Chapter 4.8, Hydrology and Water Quality, for additional information related to groundwater and wells. Additionally, see Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 29 – Near Surface Workings.

Response to Comment Ind 833-4
Please refer to Chapter 4.7, Hazards and Hazardous Materials, and Master Response 10 – Explosives, Reagents, and Brunswick Fill, for additional information related to the use of explosives and extraction chemicals.

Response to Comment Ind 833-5
Regarding hazardous rock materials concerns, please see Master Response 8 – Mine Waste Characterization. Regarding truck trips concerns, the DEIR analyzes impacts to pavement in Chapter 4.12. Specifically, the DEIR requires the Project Applicant to enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impacts to pavement. (DEIR, Mitigation Measure 4.12-6(b).) Regarding truck exhaust pollution, the DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds. Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Response to Comment Ind 833-6
Please see Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 833-7

The comment lists several general concerns related to mining; however, the level of detail provided is insufficient to allow for a detailed response. The commenter's concerns have been noted for the record.

Response to Comment Ind 833-8

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 834

From: yardcard@usamedia.tv
Sent: Saturday, April 2, 2022 1:33 PM
To: Idaho MMEIR
Subject: the Mine

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Dear Nevada County Planning Commission,

Ind 834-1 I have had health complications from ozone and smoke in Nevada County the last 10 years. I am very concerned about the potential air pollution from the mine that will make my health problems worse. Please do not approve this project !!!

Sincerely, William Hall (33 year resident of Nevada County)

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INDIVIDUAL LETTER 834: WILLIAM HALL

Response to Comment Ind 834-1

Regarding health concerns, the DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the DEIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HRA presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR.

Individual Letter 835

To: Matt Kelley, Senior Planner
Re: Idaho Maryland Mine – Rise Gold, Grass Valley
Fr: William Heck, Homeowner, **13641 Greenhorn Road**, within the mineral rights zone

March 20, 2022

Dear Mr. Kelly -

Ind 835-1 I have lived here in Nevada County since 1980, and at this Greenhorn address since 1996. During that time, I have enjoyed the quality of life that comes with rural Northern California living. Our "country quiet" is rich with frog croaks and bird song, coyote howls and the calls of red-tailed hawks. My days are filled with gardening and caretaking our property, which my family share with all manner of California wildlife. I am writing to share my concerns about the draft EIR.

Water Quality Impacts to Neighborhoods.

My well does not appear on the Applicant's map of wells. My well was drilled in 1981 by a private person who either did not know to report it or simply did not report. How many other wells may be unaccounted for?

Ind 835-2
- Please require the Applicant to conduct a door to door, parcel by parcel inquiry to obtain an accurate count of the number of wells within the mineral rights area and within 1,000 feet of the mineral rights area. I believe a door to door survey may have been a condition of approval for the EmGold project,20 years ago. This may be the only way to obtain an accurate count of the number of wells in the project area.
    - I would like to have analysis done on the impacts to private wells beyond the scope of the boundaries the project proponent has drawn. Aquifers do not necessarily follow property lines. I believe the scope of potential water contamination may be far greater than is currently considered.

Ind 835-3
- Should wells beyond the scope of the project become compromised or contaminated, Rise would need to extend NID system lines well beyond their current E. Bennet area to serve those households. I know the costs of connecting to NID is substantial, and would need to include actual hookups to each home paid for by Rise, and 80 years' worth of water payments to NID, including any costs in the raise in rates that are likely to occur over the term of the operations.

Ind 835-4
- Rise should pay the cost of testing the potability of each well identified in the EIR for its current potability, mineral and metal content before any dewatering can be approved. Then they should be required to take post dewatering samples each year of operations to determine the impacts to the wells.

Ind 835-5
- At what levels of contamination or change in water quality would be mandated for Rise to take action for private well owners, how will that be defined? Please include a definition of "contamination".
- Our well has produced sparkling clear, pure water since it was drilled, about 1981. That well is my only source of water. It has performed beautifully and reliably for my family and gardens for over 40 years.

Noise.

Ind 835-6 One of the things I love most about living on my land is the quiet. Rise Gold has said that noise would not affect people more than half a mile from the mine. They did this in a letter sent to residents, which had been written by Ben Mossman, Rise Gold's president and CEO. This is untrue. I am able to hear train whistles and track noise from the town of Colfax, and that is 12 miles away from our house. Noise and traffic from the mine site would be steady and grueling throughout the day and night. Not only that, but given the nature of our local terrain, the mine and traffic noise would be channeled directly up to my neighborhood as though it wore being broadcast through a megaphone.

Ind 835-7

Traffic and Fire Evacuation.

- I did not see any mention of fire evacuation routes in the Traffic Impact Analysis Appendix.
- The Greenhorn, E. Bennett, and Brunswick areas are known severe high fire areas and its residents have very few options for fire evacuation.
- The information in the DEIR with regard to evacuation routes was simply a cut and paste exercise of existing general plan, OES, and Cal Fire evacuation protocols. I did not see any efforts to discuss how the hundreds of employees and the vehicles and trucks would impact the community in the event of an evacuation.
- There is nothing that addressed the impact of the large trucks driving on our small, local roads. Large trucks already have to crowd the center of the road along the same routes the mine trucks would drive, in order to keep their tires off the fog lines at the edges of these small lanes. This becomes a greater problem when large trucks are hauling trailers. Local traffic is negatively impacted, and roads are worn out much more quickly.
- Please require an in-depth analysis of specific impacts of increased load due to the mining operations.

Ind 835-8

Hydropower Generation.

- Rise Gold has not applied for a Federal Energy Regulatory Commission (FERC) license, nor is power generation mentioned in the DEIR. This can be a years-long process, just by itself.
- Rise Gold has not completed the required California Environmental Quality Act (CEQA) document for this project.
- Rise Gold has not begun communications with either PG&E or NID, the other hydropower producers in the area. This is important because Rise would need to build transmission lines and substations in order to get the power they produce to the existing power grid.

Ind 835-9

Rise Gold's Demonstrated Lack of Good Faith.

Rise Gold has made many dubious claims in newspaper articles and in letters to locals about findings from "NID" studies that don't exist, approval and backing from the county board of supervisors which it doesn't have, to promote the mine. If it is willing to tell lies and half-truths to achieve its goals now, how can we ever be assured that Rise Gold will live up to any environmental promise it makes? Personally I find it hard to believe.

While I have many concerns, I have only a few stated here. I am grateful for the opportunity to comment.

Should you need to contact me, I can be reached as follows:
rbheck@gmail.com
530-913-4918
13641 Greenhorn Road
Grass Valley, CA 95945
Sincerely,

William Heck

William Heck
Homeowner

INDIVIDUAL LETTER 835: WILLIAM HECK

Response to Comment Ind 835-1
Comment noted. Responses to specific comments are provided below.

Response to Comment Ind 835-2
As discussed in Section 3.3.2 and shown on Sheet 12 of Appendix K.2 of the DEIR, over 1,200 Water Well Driller Reports (also known as Well Completion Reports) available from the California Department of Water Resources (DWR)'s online database for private domestic wells are located within approximately one to two miles of the project site. Many of these wells are geolocated by property location in the DWR database, while some are only located by the US Public Land Survey System (PLSS) township, range, and section. In areas within the predicted 1-foot drawdown from the groundwater model, wells with only general PLSS locations in the DWR database were matched to properties and plotted. The well database was also augmented with well data from the previous applicant Emgold which provides additional well information within the 1-foot drawdown isopleth that is not available in the DWR database. All available details about well construction and testing in the area of the 1-foot drawdown isopleth were reviewed and tabulated from the Well Completion Report or Emgold records and are provided and discussed in Section 3.3.2 of Appendix K.2., which are available for the majority of properties. The Well Mitigation Plan has been clarified to include measures to identify any wells not in the well database and gather individual well characteristics should an impact be predicted by the Groundwater Monitoring Plan. The revised Well Mitigation Plan is attached to the Final EIR as Appendix D. The commenter states that a complete inventory of domestic water wells within and beyond the mineral rights boundary is required for the analysis of the DEIR. However, wells outside the 1-ft drawdown were not specifically analyzed for impacts from mine dewatering because they would experience negligible drawdown and therefore would not be impacted by mine dewatering. More effort in including these wells in the well database would not change the analysis nor conclusions of the DEIR, nor the require mitigation, and therefore is not required.

With respect to the commenter's property specifically, this property is located outside of the 1-ft isopleth, as shown on Sheet 12 of Appendix K.2 of the DEIR, and therefore is predicted to experience negligible drawdown (less than one foot of drawdown) and impact from mine dewatering. Approximately five wells adjacent to the commenter's property are mapped on Sheet 12 based on the DWR database information. Nevertheless, the groundwater monitoring plan is implemented to ensure that any impact would be predicted and preemptively mitigated if necessary. Wells would not be contaminated by mining activities as water would not travel from the deep underground workings to the shallower domestic water wells. Please see Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 7 - Location of Future Mining Areas.

Response to Comment Ind 835-3
The Well Mitigation Plan has been clarified to explain actions that would be taken for well mitigation, if required, in more detail. Please see the revised Well Mitigation Plan attached the Final EIR as Appendix D. Well mitigation outside of the E. Bennett area may not include the connection to NID potable water depending on the circumstances, as storage tanks and/or well deepening may be adequate solutions. Any mitigation required for wells impacted by the project would be done so at the cost of the applicant. Please see Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 7 - Location of Future Mining Areas.

Response to Comment Ind 835-4

Baseline groundwater quality data is required to be collected 12 months before the commencement of mine dewatering and will be collected from groundwater monitoring wells, which will be representative of the groundwater quality in surrounding domestic water wells. Please see Mitigation Measure 4.8-2(a) and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 835-5

Mitigation Measures are designed to ensure wells would not be contaminated by mining activities and baseline groundwater quality data will be collected and groundwater quality will be monitored throughout operations. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The comment is noted regarding the commenter's existing groundwater well.

Response to Comment Ind 835-6

Noise from project activities has been analyzed in Chapter 4.10 of the DEIR and is determined to be less than significant after mitigation. Please see Chapter 4.10 of the DEIR. As discussed on pages 4.10-22 through 4.10-24, the noise analysis used the SoundPlan prediction model which includes the consideration of topography, distance, atmospheric absorption, topographic shielding, and ground cover. The applicable CEQA threshold of significance for noise impacts is not audibility. Furthermore, while the DEIR determined, based on best available data, that the project's operations would not result in noise levels that would exceed the County's thresholds, the DEIR conservatively concludes that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and the project's noise impacts could be significant. As a result, the DEIR includes Mitigation Measure 4.10-3, which requires implementation of a robust, ongoing noise monitoring program. The noise monitoring program shall evaluate noise levels at a minimum of five receptor locations surrounding the Brunswick Industrial Site. The noise monitoring system shall consist of the installation of permanent noise monitors at three to five locations on the Brunswick Industrial Site, and one site at the Centennial Industrial Site, to be determined by a third-party noise consultant under contract with the County, in coordination with the applicant. The permanent monitors shall be provided with a continual power source, and shall include internet connectivity technology, to enable electronic retrieval of noise monitoring data at any time by the County's third-party noise consultant. The County's third-party noise consultant is required to retrieve and evaluate mine-related operational noise levels within 30 days of commencement of mining, quarterly thereafter for the first five years, and then once per year thereafter for the life of the project. If noise levels are found to exceed the County's standards, then operation of the mine shall cease, until additional engineering controls can be implemented as needed.

Also see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 835-7

Fire evacuation routes are discussed and analyzed in Chapter 4.13 of the DEIR. Also see Master Response 5 - Evacuation Zones.

Truck traffic has been analyzed in the DEIR. Please see Chapter 4.12 and Appendix O of the DEIR. Please see Figure 3-13 of the DEIR which shows project haul routes. As described in the traffic analysis of the DEIR, numerous trucks already use these roads which have sufficient width to accommodate on-road truck traffic.

Response to Comment Ind 835-8

The applicant does not require a FERC license and no power generation, other than backup generators, is proposed for the project.

No transmission lines are required for the project. As stated on page 4.11-34 of the DEIR, the electrical grid system in the project area is well developed. A commercial sawmill that previously operated on the Brunswick Industrial Site was serviced by a dedicated 12kV PG&E power line. A high voltage power line also runs through the property west of the Brunswick shaft. Electricity for the proposed project would be supplied by the existing 12 kV PG&E line along Brunswick Road. PG&E provided a will serve letter for the project and has confirmed that there are electric facilities available to serve the proposed project in accordance with all applicable design standards, rules, and tariffs on file with the State of California Public Utilities Commission. An onsite substation would be constructed to convert utility power to the voltage necessary for project machinery and equipment (see page 3-40 of the DEIR).

Response to Comment Ind 835-9

Please see Master Response 3 - Operator Responsibility.

Individual Letter 836

From: William Huddleston
To: Idaho MMEIR
Subject: For Rise Mine proposal- submission due by 4pm
Date: Monday, April 4, 2022 12:38:20 PM

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Matt Kelley Planning Commission Supervisor

Our Family is VERY OPPOSED to the Idaho-Maryland Mine.

Ind 836-1 There are many claims made by the Rise Gold Corp. that we find to be inaccurate . Many of them were pointed out in the article written on the April 1 st "Digging Deeper "(published in THE UNION).

The Rise Corp states the they will be creating over 600 jobs in our community. When I look at the actual details they want to hire 300 people locally to work in the mine. The community will be expected to add 300 jobs to local business to service those people. My question is, "Why would we need more services for people that already live here and use existing services in our community?"

Ind 836-2 We also feel that TOURISM will be greatly impacted by pollutant being added to the RIVERS, WATERWAYS and AIR QUALITY . These will not only impact our community but will impact the surrounding communities as we have learned form Malakoff Diggins .
PROPERTY VALUES will also be impacted greatly. Our family will be expecting great reductions in our property taxes because of our proximity to the mine .

Ind 836-3 Thank you for your time,

The Huddleston Family

INDIVIDUAL LETTER 836: WILLIAM HUDDLESTON

Response to Comment Ind 836-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding applicant statements. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Response to Comment Ind 836-2

Please see Master Response 2 as it relates to tourism and economic impacts. Refer to chapters 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, and Chapter 4.8, Hydrology and Water Quality, and Master Response 35 for more information related to air and water pollution, respectively.

Response to Comment Ind 836-3

Property value concerns are outside the scope of CEQA – please see Master Response 2.

Individual Letter 837

From: Bill Larsen
To: BOS Public Comment
Subject: rISE gOLD FIASCO
Date: Monday, February 28, 2022 10:48:52 AM

Dist 1

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Ind 837-1

DEAR NC BOARD OF SUPERVISORS,

PLEASE DO NOT ALLOW RISE GOLD TO RE-OPEN ITS MINE. THE ENVIRONMENTAL IMPACT REPORT, FUNDED BY RISE GOLD, IS A SHAM, AND IT IS YOUR JOB TO EXAMINE THE MANY NEGATIVE EFFECTS OF THIS PROJECT IN EXACTING DETAIL TO PROTECT PUBLIC INTEREST AND HEALTH. TOUR BELOVED COMMUNITY WILL SUFFER GREATLY IF THIS DISASTEROUS PROJECT IS ALLOWED TO GO FORWARD.

WILLIAM LARSEN, NEVADA CITY (530-265-4049)

INDIVIDUAL LETTER 837: WILLIAM LARSEN

Response to Comment Ind 837-1

The commenter asserts that the DEIR is a sham but does not provide any specific examples or evidence to support this spurious claim. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 2.

Individual Letter 838

From: Bill Maas <BillMaas@outlook.com>
Sent: Thursday, March 24, 2022 11:36 AM
To: Idaho MMEIR
Subject: Rise Gold Mine

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Planning Commission and Board of Supervisors:

I am writing this message to state my extreme opposition to the proposed Rise Gold Mine project.

Ind 838-1 We moved up here to Nevada City 30 years ago from Marin County, and have loved the environment and life-style of Nevada County ever since. We fear our environment will be irreparably damaged by this mine. These are the main factors that concern us:

Pollution of our air and water.

Ind 838-2 Track record of Rise Gold Mining Company is very poor.

Ind 838-3 Extreme over usage of power.

Ind 838-4 Extreme over usage of our groundwater at a time when our water is in critically short supply.

Ind 838-5 Property values will decrease.

Ind 838-6 An estimated one hundred heavy truck loads per day plus the additional noise and vibration of the heavy equipment on site 24/7.

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Sincerely,

Bill Maas

William F Maas
16131 Countrywood Lane
Nevada City CA 95959

INDIVIDUAL LETTER 838: WILLIAM MAAS

Response to Comment Ind 838-1
The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. Impacts related to air and water are evaluated in chapters 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, and 4.8, Hydrology and Water Quality, of the DEIR. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Response to Comment Ind 838-2
Please see Master Response 3 - Operator Responsibility.

Response to Comment Ind 838-3
Please refer to Chapter 4.11, Public Services and Utilities, and, specifically, Impacts 4.11-6 and 4.11-11, for additional information related to electricity consumption.

Response to Comment Ind 838-4
Please refer to Chapter 4.8, Hydrology and Water Quality, for additional information related to groundwater. Additionally, see Master Responses 15 and 16, which relates to groundwater pumping and drought conditions.

Response to Comment Ind 838-5
Property value concerns are outside the scope of CEQA - please see Master Response 2.

Response to Comment Ind 838-6
Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level. Please refer to Chapter 4.10, Noise and Vibration, for additional information related to noise and vibration impacts associated with the proposed project.

Individual Letter 839

From: Yasha Aginsky <yaginsky@gmail.com>
Sent: Friday, April 1, 2022 8:12 AM
To: Idaho MMEIR
Subject: EIR comment

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Ind 839-1

As a concerned citizen and resident of Nevada City, I have followed the issue of re-opening the Idaho-Maryland gold mine with great interest. I attended the Planning Commission Public Hearing on March 24, which left me with grave concerns about the "feasible mitigation measures on potentially significant impacts" and "significant and unavoidable impacts" in the EIR. The former have been addressed by many letters and opinion pieces recently published in The Union newspaper. As for the latter, I would like to comment on their "unavoidable" effect on the quality of life of local residents.

To many of us who have chosen to live in this part of Nevada County, the natural physical beauty of the area, its relative calm and the lack of congestion are what keep us here, but they are fragile and need protection, rather than more challenges. Economic growth and industrial expansion must be weighed against their consequences for the environment, which in the case of the reopening of the Idaho-Maryland or any mine would be potentially catastrophic in terms of visual aesthetics, greatly increased truck traffic and constant noise pollution.

The era of resource extraction in our county has passed for good reasons; we are living in a populated, touristic region that depends on the health and beauty of the natural environment for economic survival and for our good health and recreation. We cannot afford ANY deterioration to our air quality, our water supply or our soil, nor can we increase the risk of wildfire or climate warming due to industry activity.

Given no environmental benefits, what is in this EIR for us residents? Profit? The main Rise Gold claims economic prosperity through creating a varying number of proposed jobs, of which they have said 213 may be local. Is that proposal reward enough to validate an 80 year permit to undermine and pollute our land and water and endanger our and our childrens' future?

As you can tell from the growing response by so many concerned citizens, this is a serious matter for the future of our lifestyle and our county. I urge you to take heed of the concerns of those who you represent and serve, and do not issue this permit.

Yasha Aginsky
541 N.Pine St.
Nevada City, CA 95959

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INDIVIDUAL LETTER 839: YASHA AGINSKY

Response to Comment Ind 839-1

Please see Master Response 1. Impacts related to visual aesthetics, truck traffic, noise pollution, air quality, water supply, and soil are evaluated in their respective chapters of the DEIR. Because significant and unavoidable impacts have been identified in the DEIR, the County, should it decide to approve the proposed project, would be required to adopt a Statement of Overriding Considerations.

Pursuant to CEQA Guidelines Section 15093, CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." Such an outcome would necessitate a Statement of Overriding Considerations.

Individual Letter 840

From: Ronni <ronninavarro@gmail.com>
Sent: Sunday, April 3, 2022 7:24 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Re-opening the Idaho Maryland Mine

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Hello Mr. Matt Kelley,

I am writing to say that I feel that re-opening the Idaho Maryland Mine would be an incredibly destructive mistake. I have strong concerns about the effects on creeks and rivers, wetland vegetation, the impact on the local wildlife, soil and air pollution. Climate change is already causing us to face droughts almost every year and bringing forth immense concerns about wildfires and our water needs. We don't need the added destruction from opening the mine. Look how low the local creeks and rivers are already. I feel the working mine will contaminate the creeks, nearby wells and destroy the wetlands. They will be focused on mining and not concerned about the devastating long-term effect on the environment, keeping the water clean, prevention of hazardous materials in the water, which will also affect the vegetation in the wetlands. Working the mine will cause voluminous noise pollution and their added traffic will impact our small community roads.

Ind 840-1

I am a native born Grass Valleyian and my family has lived in the area for close to ninety years. I grew up enjoying and appreciating our quality of life, swimming the rivers, walking the trails and viewing the beautiful nature surrounding us. It would be would be a crucial mistake to re-open the Idaho Maryland Mine. **Please vote against reopening the Idaho Maryland Mine!**

Sincerely,
Yvonne Ronningen Navarro

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INDIVIDUAL LETTER 840: YVONNE NAVARRO

Response to Comment Ind 840-1

The comment does not directly address the adequacy of the DEIR. The comment has been noted for the record and forwarded to the decision-makers for their consideration. For concerns related to creek impacts, please see Master Responses 32, 35, and 36. For climate change concerns, please see DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and Master Response 16 – Drought and Climate Change. For concerns related to well impacts, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. For noise concerns, please see Chapter 4.10, Noise and Vibration, and Response to Comment Ind 795-1. For general traffic concerns, please see Chapter 4.12, Transportation. The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 841

From: Zohar Alevizakis <tuffcris22@gmail.com>
Sent: Saturday, April 2, 2022 3:29 PM
To: Idaho MMEIR
Subject: No to mine

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Ind 841-1 I am 14 and me nor any of my friends want it

1

INDIVIDUAL LETTER 841: ZOHAR ALEVIZAKIS

Response to Comment Ind 841-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1.

Individual Letter 842

DO NOT
I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying caree with an average expected annual earnings of more than $122,000 including benefi The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a ~~irresponsible~~ damaging project for Nevada County. I urge the Board of Supervisors and other county officials to ~~help~~ not start our local economy by ~~strongly~~ not supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Please do not put money before

Address the health & well-being of ZIP

Phone Grass Valley residents. I implore you!

Email Address You are servants of the people

Please leave a legacy that you can be proud of.

Borelli/Mann
12714 Friar Tuck Rd.
Grass Valley, CA. 95949

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Ind
842-1

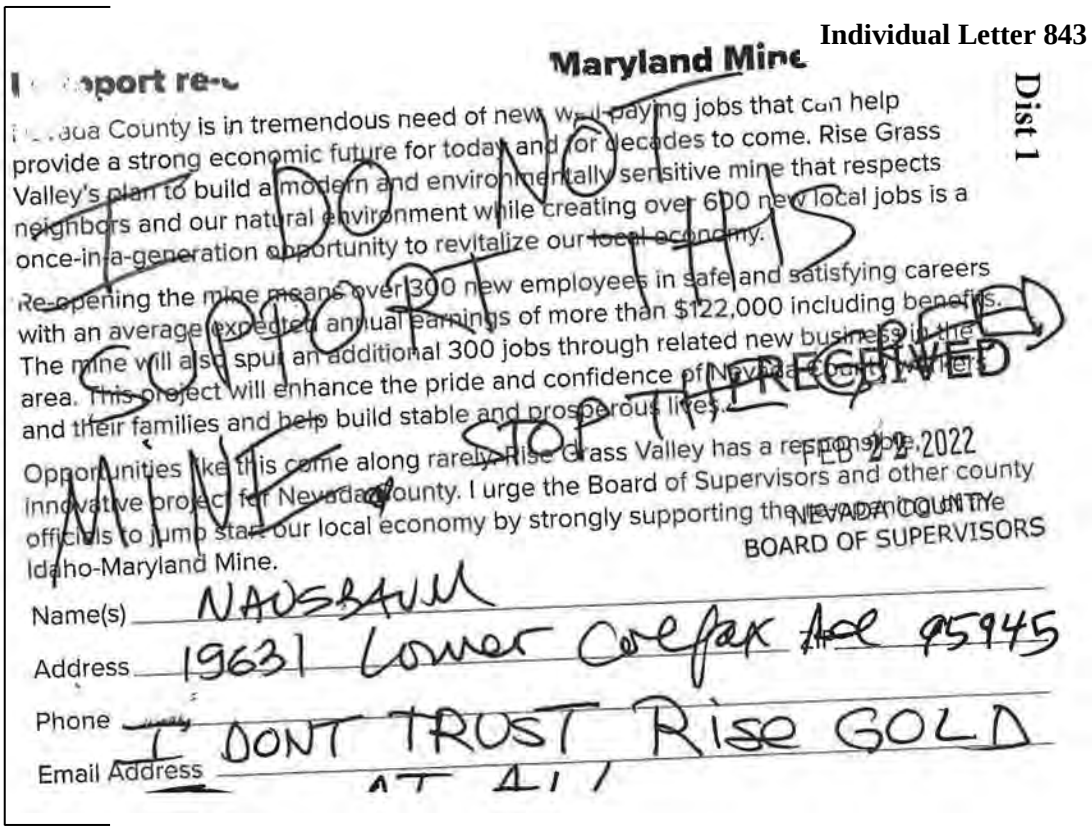
I

INDIVIDUAL LETTER 842: BORELLA / MANN

Response to Comment Ind 842-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1.

Individual Letter 843



I support re-[illegible] Maryland Mine

Dist 1

Nevada County is in tremendous need of new well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the Idaho-Maryland Mine.

DO NOT SUPPORT THIS MINE STOP THIS

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) NAUSBAUM

Address 19631 Lower Colfax Rd 95945

Phone

Email Address I DONT TRUST Rise GOLD AT ALL

Ind 843-1

INDIVIDUAL LETTER 843: NAUSBAUM

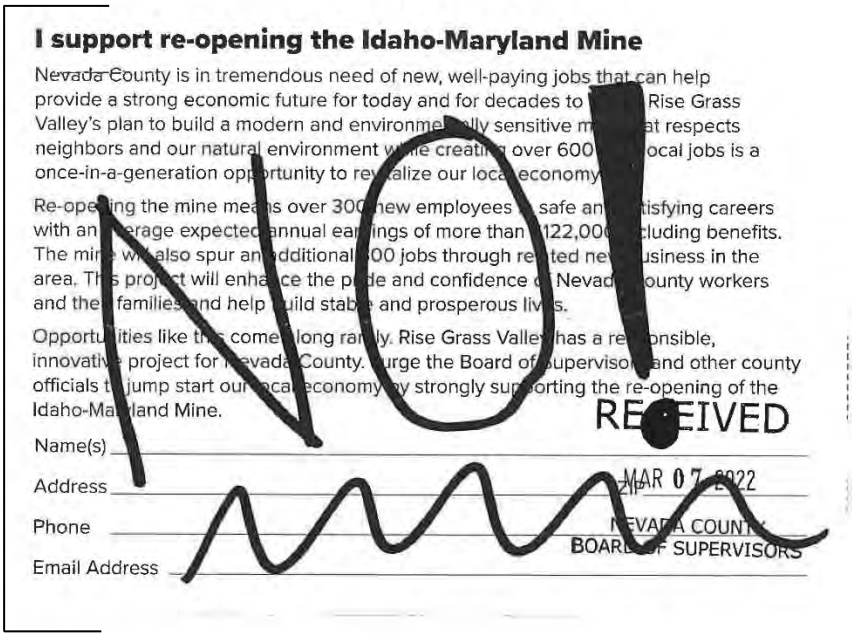
Response to Comment Ind 843-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1.

Individual Letter 844

Dist 3
Savelly
224 Fiddick Ln
Grass Valley

Ind 844-1



I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to [illegible] Rise Grass Valley's plan to build a modern and environmentally sensitive m[illegible]at respects neighbors and our natural environment while creating over 600 [illegible]ocal jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees [illegible] safe and [illegible]tisfying careers with an [illegible]erage expected annual earnings of more than $122,000 [illegible]cluding benefits. The mine will also spur an additional [illegible]00 jobs through related new [illegible]usiness in the area. This project will enhance the pride and confidence of Nevada [illegible]ounty workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

YES!

RECEIVED
MAR 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) _____

Address _____ Zip _____

Phone _____

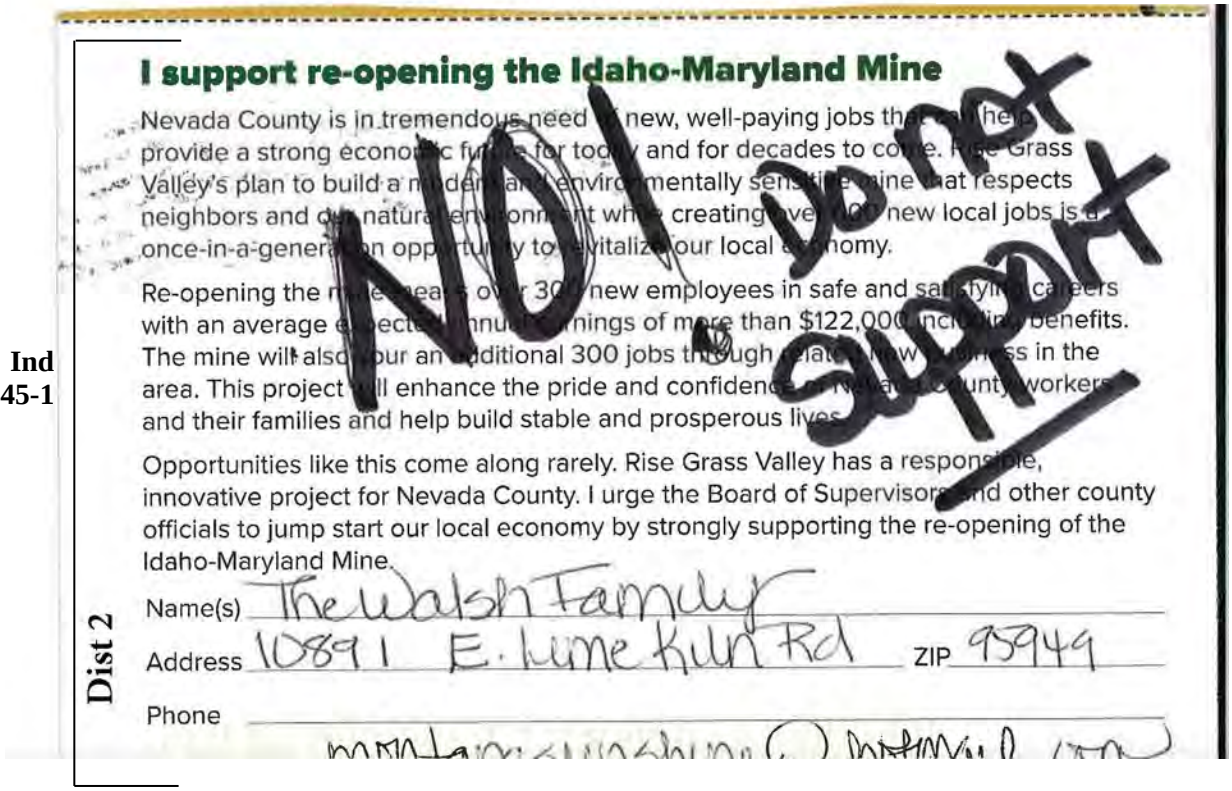
Email Address _____

INDIVIDUAL LETTER 844: SAVELLY

Response to Comment Ind 844-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1.

Individual Letter 845



I support re-opening the Idaho-Maryland Mine

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Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also support an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

NO! I do not support

Name(s) The Walsh Family

Address 10891 E. Lime Kiln Rd ZIP 95949

Phone

Dist 2

Ind 845-1

INDIVIDUAL LETTER 845: WALSH

Response to Comment Ind 845-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1.

Late Letter 1

From: CLAYDON GERIATRIC MEDICINE
To: Idaho MMEIR
Subject: Opposed to Mine opening
Date: Tuesday, April 5, 2022 10:19:24 AM

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Dear Matt Kelley,

As business owners, we are very much in favor of free enterprise. We have lived in the county since 1981 and love the rich history.

Lt 1-1

We also are realistic and recognize that we are in an historic drought. Depleting our ground water seems to be an illogical step to take if we are looking to improve our county's health.

We are very much opposed to the reopening of the mine. This property could have a use that is not harmful to our quality of life.

Respectfully,

Christopher and Susan Claydon

CLAYDON GERIATRIC MEDICINE
Christopher Claydon, MD
Susan Claydon, NP

152 Catherine Lane, Suite A
Grass Valley, CA 95945
Phone 530-271-0432 fax 530-271-2200

Sent with ProtonMail secure email.

LATE LETTER 1: CHRISTOPHER CLAYDON

Response to Comment Lt 1-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Quality of life and economic concerns are outside the scope of CEQA – Please see Master Response 2.

With regards to concerns about drought, please see Master Response 16.

Late Letter 2

From: NEALEEN COWARD
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: NO MINE
Date: Wednesday, April 6, 2022 1:46:11 PM

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Lt 2-1

I am a registered voter and resident of Grass Valley. I moved here to enjoy the peaceful quiet and solitude of the California Sierra Foothills.
I can see that this mine would diminish the quiet solitude of the current environment I moved here for.
The current studies of the Rise plan is a whitewash of wishes not results. We cannot be an experiment of a failed industry. The noise and air pollution is just a small part of the invasion into our quiet, calm community which is happy the way we are.

WE DO NOT WANT TO HAVE A GOLD MINE HERE AGAIN EVER!!

LATE LETTER 2: NEALEEN COWARD

Response to Comment Lt 2-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

With regard to concerns about air pollution, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Noise associated with the proposed project is addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

Late Letter 3

From: Rick David Larsen
To: Idaho MMEIR
Subject: Idaho Maryland Mine
Date: Tuesday, April 5, 2022 10:33:00 PM

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Lt 3-1

To whom it may concern,

Why would you hand over the keys to the kingdom to someone with a known history of deceit and criminality? Whether we are talking about national politics or local small town issues the answer should be: fool me once shame on you, fool me twice shame on me.

I've been quietly considering the potential opening of the Rise Gold Mine in Grass Valley. Full disclosure: I have not fully researched this in depth and I definitely see how we are all dependent on mining and various minerals. So, while I think it would be hypocritical to be against any and all mining projects, I'm against this one. There is a lot of information flying around about this project but to me it comes down to this one issue which makes it a non-starter.

This area has no small history with mining, with many of the sites being built and thriving during the California Gold Rush era. I recently took a ride up to North Bloomfield, an historic mining site not far from here which had 1200 residents or so at its peak and was originally named Humbug. It's a nice little drive out on Hwy 49 from Nevada City. It's now mostly known as Malakoff Diggins State Historic Park, it's worth a visit. It's significant as it was the largest hydraulic mining site in California but also known for Woodruff v. North Bloomfield Gravel Mining Company which was a lawsuit brought against the mine by farmers in 1882 and the decision favorable to the farmers is considered the first environmental law in California.

Now to the present. In a letter to the editor at The Union newspaper, a Nevada City resident states that "Mr. Mossman's (CEO of Rise Gold) past patterns of behavior demonstrate to me that he is extremely unlikely to be a good steward of the operating permit for the Idaho-Maryland Mine, nor will he protect the essence of what makes Nevada County a paradise."

Don Rogers, the publisher of the Union, in an article that leans toward giving the project the benefit of the doubt but admits there is a very present public skepticism about it states, "It doesn't help that his (Mossman) experience running a mine in British Columbia ended (7 months) with a spill left to locals to clean up, abandonment, bankruptcy and criminal proceedings still pending." Bankruptcy was declared in 2016 and Mr. Rodgers assessment seems understated given the toxic legacy that was left behind. As of 2021 the site was still considered by BC Mining Law Reform as one of British Columbia's "Dirty Dozen" top polluters.

As we go to the polls next time I would suggest rejecting any local politician, county supervisor, city council member etc. who supports bringing this kind of legacy to our community.

Thank you, R. Larsen, Nevada County resident living near Nevada City proper.

Sent from my iPad

LATE LETTER 3: RICK LARSEN

Response to Comment Lt 3-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Late Letter 4

From: bobbyburb@icloud.com
To: Idaho MMEIR
Subject: Draft EIR
Date: Wednesday, April 6, 2022 3:26:42 PM

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Lt 4-1

I am incredibly disappointed in the casual dismissal by the EIR of many potential disruptions to our environment, and as a homeowner in the immediate vicinity of the mine, the quality of life and financial issues that reopening of this mine represent to my family and neighbors. I hope that the County Board will look at this proposal realistically, and not be swayed by the false hype offered by Rise Gold in order to gain public support.

Robert S Burbridge
12976 Madrona Leaf Ct.
Grass Valley, Ca 95945

LATE LETTER 4: ROBER BURBRIDGE

Response to Comment Lt 4-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Late Letter 5

From: sgotla@gmail.com
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Idaho Maryland Mine
Date: Tuesday, April 5, 2022 7:38:18 AM

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Hey Folks,

Please reconsider reopening the Idaho Maryland Mine.

I'm a 30+ year resident of Nevada County and have sincere concern this project could contaminate the local watershed and ruin groundwater wells in the surrounding area. I have witnessed the adverse consequences of mismanaged land use associated with mining throughout Nevada County and the Sierra Nevada Foothills. To this date we are still cleaning up, remediating, and dealing with the toxic and poisonous old mine sites throughout the foothills.

Lt 5-1

I've grown up with friends on the North San Juan Ridge who've had their ground water wells both contaminated and depleted because of mining in their neighborhoods, specifically in some cases by the Siskon Mine. This mine also contaminated the drinking water of nearby school Grizzley Hill - The mine had to pay to truck in drinking water because the mine contaminated the schools well. That said, it appears the groundwater model used in the DEIR is flawed and the baseline assumptions used are erroneous. This is not scientific data and many citizens of Nevada County know first hand how disastrous mines can be to the local groundwater. Please reconsider the information being presented in this study and how it relates to Hydrology and Water Quality.

Furthermore I have concerns over traffic and noise for the surrounding neighborhoods. Many folks moved to rural Nevada County for the peace and quiet of the mountains. We are all hearing that residents living in the immediate area are extremely concerned with the amount of noise and traffic the mine will generate. Please take their concerns to heart when making final decisions whether or not to open the mine.

As final decisions are made, I hope the quality of life for our local citizens and our beloved natural environment are given higher priority than a little temporary economic gain for RISE Gold, some out of town Canadian Company.

Thank You,

Sebastian Gotla
30+ Year Nevada City Resident.

LATE LETTER 5: SEBASTIAN GOTLA

Response to Comment Lt 5-1

The commenter expresses general concerns regarding contamination and depletion of groundwater wells, and states that the groundwater model used in the DEIR is flawed and the baseline assumptions used are erroneous. With respect to these concerns, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek.

The commenter also expresses general concerns regarding traffic and noise, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Late Letter 6

From: Valerie Kack
To: Idaho MMEIR
Subject: Mine
Date: Tuesday, April 5, 2022 5:57:41 PM

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Lt 6-1

I have lived in Nevada County for 40 years. And have fought the reopening of the mine so many times. By position is unchanged. I live on Wolf Creek, I am there at its banks 2 to 3 times a day, I watch what happens after the rains. The toxic chemicals which have remained in tunnels from old mines a long Wolf Creek get flushed into the creek and along the shore remain pools where this sludge resides. It is a red Algae bloom, arsenic, oil slicks, and fish we have caught from the river have had cancer. I feel very strongly about protecting our rivers and our fresh waterways. To add the horrible chemicals and seepage from opening that mine will decimate the nature that lives along this creek. I get seepage even in the feeder creek that goes right next to my house down to Wolf.I see the same toxic disregard from other humans who think they can dump their used oil into the waterway. It comes by me, I see it every day. Please do not let this mine re-open nor any other mining organization in the future. Can we please consider our mining history just that... history.
Valerie Kack
Valeriekb@SBCglobal.net

LATE LETTER 6: VALERIE KACK

Response to Comment Lt 6-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1.

Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With regard to concerns about impacts to waterways, please refer to Chapter 4.8, Hydrology and Water Quality, of the DEIR and Master Response 35 - Discharge to South Fork Wolf Creek.

----------x

TRANSCRIPTION - IMM COMMENT MEETING VIDEO:

----------x

TRANSCRIBED FROM NEVADA COUNTY PLANNING COMMISSION SPECIAL MEETING

IDAHO-MARYLAND MINE DRAFT EIR PUBLIC COMMENT MEETING

THURSDAY, MARCH 24, 2022, at 9:30 A.M.

BOARD OF SUPERVISORS CHAMBERS

950 MAIDU AVENUE, NEVADA CITY, CA 95959

REPORTED BY: BRANDI CHAMBERLAIN

[START NEVADA COUNTY PUBLIC COMMENT HEARING_IDAHO-MARYLAND MINE_3.24.2022]

[START AT 1:31:22]

AL: I, I found the, uh, the whole EIR very complete. I reviewed the one at Rancho Seco where I work at the nuclear power plant and it was very comparable to everything being covered. I also have, uh, experience in the nuclear navy with water treatment under Admiral Rickover. And, uh, their water treatment parallels what we had in the navy aboard the enterprise to protect our eight reactors which was two parts per billion.

Meet-1

Also, with the world situation today, the minerals that are down there, not only gold but also tungsten, which is used as anti-tank munitions, should be considered strategic materials. We need those materials badly and with all the electronic systems functioning today and with hypersonic missiles and so on, all needing gold contacts--remember, gold will carry a

Meet-1

charge and not corrode. So it's very important in all these strategic electronic systems. So what we have here is, is essential to our, our nations future looking at potential war with Russia and China. Thank you.

GREENO: Thank you, Al. And, again, I'll just remind if you would please hold your comments to adequacy of the EIR.

Meet-2

SILVERSTEIN: Hello, thank you. I'm Ralph Silverstein [phonetic], President of CEA Foundation. CEA stands for Community Environmental Advocates. We are also the sponsor of MineWatch. Over a year ago CEA established a research team composed of various talented and concerned community members and representatives from other community groups. I'm told there are over 400 people out here.

We have a wide range of expertise varying from a general building contractor to people holding MBA degrees, geologists, a Ph.D. in civil and environmental engineering,

and master's in computer science, science teachers, an author, and others are among our ranks. We have also expert consultants to address certain areas and our legal representative is Houghton Helene Weinberger [phonetic], who will be submitting detailed comments on the draft.

Our goal has been to review the technical studies for the mine project for the purpose of public education and to review the draft EIR extensively, to assure that the EIR is accurate and adequate. In summary, we have conducted an extensive review.

What is most surprising is that after well over a year in the preparation to produce a massive document, it has so many missing elements and so many inadequate assessments. Starting with the most fundamental aspects, a good EIR relies upon adequate and reliable data in order for the decision makers, that's you, to be adequately informed. Yet, in this draft we

Meet-2

find almost no useful text--uh, test results for assessing air or water quality hazards for mine waste.

Meet-2

For example, to determine air quality impacts, the results rely upon data that is collected from inadequate sampling that was also processed incorrectly. Hydrology studies rely upon narrow bands of data that were collected over 15 years ago and even these data are misinterpreted in some cases. Even at the higher level, the project fails to address important areas of study and omits the Centennial cleanup on Idaho-Maryland Road.

Meet-3

The extensive mine tailing waste that is on the Centennial side is currently part of a cleanup project that is still not even approved by the Department of Toxic Substances Control, or DTSC. The site contains contaminants such as arsenic and lead, and more, that pose potential hazard to people and the environment. Correspondents from the EPA in 2019 stated

Meet-4

Meet-4

that the Centennial's site potential designation as a superfund site was conditionally deferred because Rise entered into a cleanup contract with the DTSC. Yet this draft EIR is based upon an assumption that it is already cleaned up.

Meet-5

The examples of inadequacies are abundant. Members of our organization will touch on some of them today and they will be fully documented in our written comments which will be submitted on March 30th. Thank you very much.

GREENO: Thank you, Ralph.

Meet-6

RAVINES: Good morning. Greetings. I am Barbara Ravines [phonetic]. I have lived in Grass Valley for the last eight years of our 25 years here. I am a member of the CEA Foundation and active in many other organizations in the county. I think--

GREENO: [Interposing] Barbara, will you give us your address?

RAVINES: Pardon me?

GREENO: Address?

Meet-6

RAVINES: Oh, 10--thank you. I may screw that up. 108 Bridger Court, Grass Valley, sorry. I thank the Planning Commission and Department of--the Department, actually, for its hard work on this project.

My interest is groundwater impacts and mitigations. In the DEIR, groundwater impacts are concluded to be significant but avoidable mitigation. It was the DEIR's conclusion with inadequate analysis, unreliable monitoring, unfounded impact criteria, and mitigation measures that are

Meet-7

of unproven effectiveness. We need to know with accuracy what could happen to the hundreds of residential wells in the impact area of this vast, underground mine, when it begins operations over the next 80 years.

Of critical concern, the proposed project would sig--significantly affect local groundwater resources by dewatering the mine, lowering groundwater levels. The DEIR recognizes groundwater levels to be lowered to 242 well owners but then assumes

that having one's well water go down a couple of feet is not a problem. Considering that we are in a long range drought and worsening climate change, this arbitrarily low impact threshold is invalid.

Meet-7 The mitigations proposed by the EIR--DEIR are inadequate foremost because there is a potential impact to well owners in the area. A comprehensive monitoring plan must be implemented prior to dewatering established--to establish a baseline. The monitoring, monitoring should run at least three years. The monitoring plan that was done for the 2008 application is outdated, does not cover enough area, and has--is based on only operating for 20 years, unreliable monitoring.

Meet-8 Models of the groundwater in fractured rock have serious reliability issues. The model used is DEIR is assumes that the rock mass is homogeneous. There are too many faults and too little data to trust that model to produce valid results. Plus, the

Meet-8

model assumes that the mining will be limited to very narrow region and yet even in the hydrological model report it shows proposed mining that extends outside of the mineral rights zone.

I'm going to say essentially no water balance assessment was provided as well, and these issues need to be rectified...

GREENO: Thanks, Barbara. And thanks for working through the little interruption there. Cellphones off, please. That, that will help. Welcome.

Meet-9

SCHWARTZ: Thank you for giving me an opportunity to speak. My name is Paul Schwartz [phonetic]. I live at, uh, 13812 Meadow Drive, Grass Valley, in District I. Um, I came to, to Nevada City in 1971. I have an AA, a BS, and an MBA in business administration. I was Director of Maintenance and Operations for Pleasant Ridge School District for 19 years and a capital planner at UC Davis for 10 years.

I was a member of the Grass Valley

Planning Commission for six years and Parks, Parks and Recreation Commission for two. And I'm a volunteer with the Community and Environmental Advocates Foundation.

Meet-9

We agree with the DEIR conclusion that the aesthetic impacts of the mine project would be significant and unavoidable. We feel throughout the DEIR our local conditions are seriously undervalued. Brunswick Road is concluded to have only moderate visual sensitivity because it includes a past industrial site, and a moderate traffic levels with corresponding moderate number of viewers.

Meet-10

This ignores the fact that it is a major entryway into the Brunswick basin. As an entryway, it will continue to grow in importance and traffic volume. It represents the first impression for many guests to our community and should not be dismissed because it does not have a scenic designation.

There is a direct link between our

Meet-10

economic success and the natural beauty of our area. Brunswick Road will become busier and busier, and should be recognized and protected from development that impacts its future success as an entryway to our community and a major arterial. These issues should be added to the DEIR.

Meet-11

Mitigation 4.1-3, the DEIR concludes that the mine project will not create a new source of substantial light and glare which would adversely affect day or nighttime views in the area. We disagree. Regardless of previous industrial activity at this location, decades have passed since their departure and the area is now predominantly rural, residential, and quite dark at night. The new level of light from project lighting and the nighttime hauling described in the DEIR would be unacceptable given the current low, very, very low ambient night lighting of the area. Dismissing these impact is unacceptable and analysis that recognizes these impacts must be part of the EIR. The

impact is likely unavoidable.

The DEIR describes the no project alternative in terms that maximize the development of the Brunswick property. As a result, the alternative use option was not considered. In reality, an industrial mixed use project is a distinct option and in the future that might include utilities, manufacturing, information, RND, real estate, professional, the arts, entertainment, recreation. All of these would create more jobs, use less energy, have lower carbon footprints, and generate more local wealth than the Rise Gold proposal. The alternative sections in the DEIR need to be more honest and profession in describing alternatives to the Rise Gold proposal. Thank you.

Meet-12

GREENO: Thank you, Paul.

CLARKE: Good morning. I'm Bill Clarke [phonetic]. I live at 324 Vistamont Drive, Grass Valley. I'm a member of the CEA Foundation. I'm a 21-year resident of Grass

Meet-13

Valley and a retired aerospace engineer with a master's degree in systems analysis and electrical engineering. My experience has been in systems analysis and systems integration, and as a past member of the Nevada County - - I was involved in the publication of a report on the air quality in Nevada County.

Meet-13

Nevada County current gets an F rating when it comes to air quality and we have twice the state average of lung disease. Fugitive dust from rock crushing and transport, diesel exhaust from constant truck traffic, and the presence of asbestos fibers and dust will make a bad situation much worse. The DEIR does not adequately discuss these impacts.

Meet-14

The issue of controlling fugitive dust during construction activities is not adequately addressed beyond keeping the roadways wet or suspend operations when the wind blows. The issue of diesel exhaust from constant truck traffic is not

adequately addressed beyond using equipment with tier 4 engines, but only on equipment owned by Rise Gold.

There will be pollutants and toxic particles generated underground by drilling and blasting that may be exhausted from the headframe vent stack. Those pollutants consist of toxic airborne contaminants, asbestos fibers, and silica dust. Mitigations are proposed to prevent this but they are not adequate. The ASUR plan attempts to minimize asbestos fibers and fragments from being carried to the surrounding environment but this is a plan, not a mitigation.

Meet-14

Rise Gold owns more than 2,500 acres of mineral rights and has drilled 19 exploration drill holes for asbestos sampling and ore assessments. The sampling analysis and test results are questionable. There is an inadequate discussion of the sampling process itself. How are tons of rock left sitting in a silo until testing

Meet-14

has been completed be kept safe from the release of toxic materials? What happens when multiple loans of--loads of mine materials exceed the asbestos threshold?

Finally, additional air quality monitoring stations have not been proposed to accumulate pollution data, to measure how well the mine is performing with respect to air quality criteria.

This is just the tip of the iceberg considering air quality impacts. To the county staff and Planning Commission, you must continue your due diligence...

GREENO: Thank you, Bill. We appreciate your, your comment.

Meet-15

HUBBARD: Good morning. My name is Bob Hubbard [phonetic]. I am a resident of Grass Valley, living on property directly adjoining the Brunswick industrial site. I am a retired symphony musician, taught at Stanford University. And I am also a machinist operating a small manufacturing business. So I fully understand both sound

and measurement. I am a member of CIA--CEA, pardon me.

[Laughter]

HUBBARD: The DEIR noise evaluation is riddled with inaccurate data, false assumptions, and pure conjecture used to invent conclusions about reality. For instance, the ambient sound levels measured and used for the study date back to 2017-18. This is inaccurate data. The ongoing consequences of this project will not be known until after the initial construction is finished and the operation of the mine commences, easily four to five years in the future.

Meet-16

The studies should look at projected future neighborhood growth and make a reasonable evaluation of additional noise in the context of future ambient conditions in which the mine will be operating.

The study chose to measure the sound levels of the nearest receptors, the neighboring parcels of the property owners

homes, which are located the greatest distance from the source of the sound. The true impact of the noise on these parcels can only be determined by measuring at the property boundary. According to the county general plan, the decision to measure at the boundary is a county decision. So I am asking the county to make this a requirement.

Meet-16 The wording of the study is such that any level of noise that would not get the operated cited for a noise violation is acceptable. I have measured the noise level of the garbage truck collecting my garbage at 39 decibels inside my house. The study says the constant and continuous noise level of the Brunswick site will be 85 decibels, more than 20 times that loud, from 6 a.m. to 10 p.m., seven days a week. Think about how far away you can hear that garbage truck and ask yourself if you want that noise to be a constant part of your life.

Meet-17 The study dismisses the nighttime noise levels as not significant but that

Meet-17

conclusion once again is based on estimated data, and does not take into account that nighttime is a rural--in a rural residential area is not the same as nighttime downtown. It gives the surrounding community eight hours of lesser noise each day. So you better get to sleep at 10 if you want to get your rest. We retired folks don't live on the clock. We have a quiet, rural neighborhood.

Meet-18

Despite the study's denials, there is wildlife living on our property and the mine property. Deer wander the neighborhood freely. There is a resident owl who hoots softly in the evening. We have a neighborhood bear that visits from time to time. The operation of this mine will drive the wildlife away, and that and the associated noise will totally change the character of the neighborhood and much of Grass Valley from a peaceful, rural setting, to a noisy urban industrial complex, totally unlike it is today.

The DEIR must be redone to address these and other issues. Thank you.

GREENO: Thank you, Bob. Cellphones, there's an off switch on the side of them. Please use it.

MALE VOICE: Could you have the speaker microphone turned up? It's very hard to hear.

GREENO: Did you get that, Shelly or Jeff? If we can bring the speaker's microphone up?

SHELLY: Unfortunately that is the volume of the speaker for the feedback. So if we can get everyone to just speak a little bit higher, please?

GREENO: Or pull the microphone in. Go ahead, sir.

Meet-19

RAVINES: My name is Don Ravines [phonetic]. I've lived in Nevada County for 18 years. I have now lived at 108 Bridger Court in Grass Valley for the last eight years. I worked as a system analysist for 44 years managing the software company

consulting with large banks and Conservation Chair at Sierra Foothills Audubon Society. I am a member of the Nevada County and Grass Valley Energy Action Plan working groups, Coordinating Chair of Nevada City 100% Renewables Committee. And I'm a member of the Community Environmental Activist Foundation.

In 2018, Nevada County adopted an energy action plan to assist the county in implementing the energy goals and policies in the county's general plan, and inform the community of best practices that will help them save energy and money. The energy action plan calls for a 51% reduction in greenhouse gas emissions for electric use-- electricity use by 2035, which is in close alignment with state goals. The plan forecasts residential energy reduction savings from building efficiency of 42 million kilowatt hours per year.

Meet-19

The DEIR states that the amount of electricity required to operate the mine

Meet-20

would be approximately 49 million kilowatt hours per year, which would erase any residential electricity savings obtained by the plan. Even more stunning when you know that the total nonresidential electric use of the county in 2017 was 53 million kilowatt hours a year. So this one mining project would almost match all other nonresidential electricity use in the county and wipe out the projected nine million kilowatt hour a year's nonresidential efficiency savings.

Meet-20

Asking residents and business owners to cut down their use of electricity while allowing the electricity use of the mine would be highly counterproductive. The DEIR must explain how the project intends to comply with the goals of the Nevada County Climate Action Plan.

Emissions standards, for the years 2033 to 2102, the DEIR shows 9,000 metric tons of annual greenhouse gas emissions and declared them to be under the threshold of

Meet-21

significance. The DEIR seeks to justify its chosen significant threshold of 10,000 megatons of CO2 for operational greenhouse gas emissions by looking to other air district standards. This standard from other air districts was based on old California requirements and is not consistent with SB-32 statewide greenhouse gas reduction goals for 2030 and beyond.

Meet-21

The DEIR must use a significant threshold that will achieve California's new statewide greenhouse gas reduction goals over the proposed 60 year lifetime of the project. Considering state goals and the severity of climate change, any operational greenhouse gas emissions over existing conditions are significant. The project should be net zero, so it will not mitigate these critical impacts below the significant level.

GREENO: Thank you, Don.

Meet-22

BRIARS: Morning. My name is Ray Briars [phonetic] and I live on Northview

Meet-22

Drive in Nevada City. I've got a BASC in electrical engineering, 38 years of engineering experience in the TV products industry, and I've been 14 year in retirement. CEA is one of my volunteer activities.

Water quality, the hydrology report repeatedly uses discharge screening limits and data from the new Brunswick shaft to define water treatment criteria. Unfortunately, this information is outdated since it was from only one sample. The same

Meet-23

report's analysis show that water flow from the near, near the surface seeps into that shaft, goes down into the mine, and flows, flows out over a mile away from the point where the mine drains into Wolf Creek near Centennial Drive. A more accurate sampling would be from locations where the water has actually flowed through a part of the mine.

A couple of sample sets were taken from the drains in a single month of 2018. These samples indicated higher--high levels of

iron, manganese, arsenic, aluminum, and zinc, than the new Brunswick shaft samples. These values today exceed safe water quality standards and the contaminated water continues to flow into Wolf Creek.

Meet-23

The DEIR has not provided enough information to correctly assess the potential water quality impacts from the mine. The only accurate way involves testing samples from regions within the mine itself. The current DEIR assessment of water quality impact is inadequate. Concerns must be evaluated and recirculated for public review.

Meet-24

Explosives, on page 4.7-28, the DEIR specifies no mining proposed closer than 500 feet from the surface. Thus, explosives in transit would be at least as far from the surface. This makes no sense since one of the more--one or more years of construction activity will require explosives prior to the construction of the longer term storage facilities underground. The DEIR fails to

identify quantity, type, or management of early phase explosives during construction. This must be identified as a significant impact that cannot be mitigated.

28,000 pounds of explosives would be stored underground at any given time. Approximately every two weeks, trucks carrying explosives will be taking the offramp from Highway 2049 at Brunswick Road and driving through the heavily used intersection, past the new Loma Rica development, and then under the airport. This is defined in the EIR as a significant impact which can be mitigated but the mitigations are inadequate. It must be listed as significant and unavoidable.

There is substantial community concerns about impacts to the airport and the air tankers that keep us safe during fire season. Many other significant issues with explosives cannot be mitigated.

Meet-24

GREENO: Thank you, Ray. We will be breaking for lunch at 12:00. How are you

guys doing for that schedule? We'll make it? Okay, go ahead.

BLANCHARD: Good morning, Commissioners. My name is Jillian Blanchard [phonetic] and I'm a member of CEA. My home is 19159 River Crest in Grass Valley. And thank you for taking the time to listen to us today. I have been a land use attorney for over 20 years and I have grave concerns with this draft EIR. I'll send a comment letter with details but I want to focus today on two fatal flaws. First, the failure to identify and analyze the full project. And, second, the use of a future baselines that assumes the cleanup of Centennial has already happened but it hasn't.

Meet-25

CEQA requires the draft EIR to identify the whole of the action as a single and complete project, to analyze all potential impacts. It prohibits expressly any attempt to separate out a portion of the project mainly because doing so leads to an underestimate of impacts and does not inform

Meet-26

the public of the actual damage this project will cause. The draft EIR fails this basic CEQA requirements by segmenting out the Centennial cleanup from the project which results in an undercounting on impacts.

The draft EIR approach feels a bit like a bait and switch from what was promised to the public originally. The NOP identified the Centennial cleanup originally as a, quote, "essential part of this project that would be analyzed in this CEQA document."

Meet-26

The project involves, as you know, placement of mine waste onto 44 acres of the Centennial site which can only happen once it's cleaned up by Rise.

So it's a necessary part of this project. But, incredibly, the draft EIR removes this huge component of the project and assumes that all of the grading, truck traffic, air quality impacts associated with the cleanup at Centennial, including impacts to four acres of wetlands, has magically already happened.

Meet-26

During this--doing this allows the draft EIR to ignore critical impacts including cumulative impacts of the Centennial cleanup. For example, the draft EIR assumes that half of the Centennial site has already been disturbed by the cleanup, which conveniently cuts the biological impacts in half. The design itself may change. It is still under review by DTSC. It has not been approved. And the cleanup definitely has not yet happened.

CEQA requires the whole project to be reviewed together, to get an accurate picture of impacts from the mine waste. What's worse, the draft EIR assumes that the cleanup has been completed for five environmental impacts, but then assumes it hasn't been done for the remaining eight. This approach is dangerously inconsistent and does not comply with CEQA.

In over 20 years of land use practice, I have never seen this done. It exposes the county to significant legal liability and

allows Rise to play a shell game, hiding impacts between the two projects. To protect itself and this community, the county must include the Centennial cleanup and recirculate this draft EIR. Thank you.

Meet-26

GREENO: Thank you, Jillian. Good morning.

OBERHOLZER: Lori Oberholzer [phonetic], 310 Nevada Street. I'm a CEA board member and a 37-year resident of Nevada City. I served on the City Council and Planning Commission for 19 years with the term as mayor. And I'm also a city and environmental planner. And as a consultant I have written many EIR's throughout northern California for the past 30 years.

Meet-27

You've heard a number, many of our members just now, conclude that the DIR-- DEIR has underestimated the impacts of the mine and these extension--extensive additional reexamination, analysis, and mitigation measures. So here is a quick summary of some of the points we've just

made.

Surface water quality impacts are underestimated, including drainage reaching Wolf Creek with excessive levels of iron, manganese, arsenic, aluminum, and zinc. Groundwater and well impact discussions are inadequate, including ignoring the impacts to most well owners and an unreliable groundwater model in our fractured bedrock system which affects groundwater flow, as many of us know firsthand.

Meet-28

The air quality section lacks adequate mitigation to protect workers and the public from adverse health impacts associated with the most feared constituents of mine dust, asbestos and silica. The greenhouse gas and energy use sections are also severely lacking. The DEIR neglects to make it clear that this one mining project using 49 million kilowatts per hour of electricity would erase any residential electricity savings attained by the Nevada County Energy Action Plan.

Meet-28

Nighttime noise and vibration and sleep disturbance, plus impacts to residents from a substantial increase in the very quiet ambient noise in the area are dismissed. And also long term impacts to 24 hour noise exposure over the entire lifetimes of area residents has also been not evaluated.

Meet-29

The DEIR also needs to explore a wider range of alternatives, including an alternative land use that better reflects our community needs and which can eliminate these impacts and the many other impacts that are likely to be revealed in the final EIR after the comments received today are evaluated.

Meet-30

And finally, again, we simply do not understand the complete exclusion of the Centennial waste cleanup site from the DEIR discussion. This is a major flaw.

Meet-31

The DEIR clearly will need recirculation after it is revised. I do hope that the Planning Commissioners will also take the opportunity today to ask the

Meet-31

consultants to bring back additional evaluation that you personally think is particularly needed. And we hope that our comments today will help you to be better informed on this community changing project. Thank you.

GREENO: Thank you.

Meet-32

HUBBARD: Hi, I'm Christy Hubbard [phonetic]. My address is 12966 Mink Court, in Grass Valley. Today I'm talking as a representative of the Wells Coalition. And we're a group of well owners in the vicinity of the mineral rights area of the Idaho-Maryland mine.

Meet-33

After reviewing the DEIR, we feel the well mitigation plan is not adequate. A key concern is that the county has failed to adequately define the true area of potential impact. The report repeatedly acknowledges the high level of uncertainty in hydrological models. You've heard a lot about that today and you'll hear more I'm sure. And yet the applicant has a

mitigation plan for only 30 properties. There's no acknowledgement of risk or plan to safeguard domestic wells in the surrounding area.

Meet-33

Since public records tell us that there are roughly 525 private wells within a half mile of the mineral rights boundary, this is a significant concern. Bear in mind that this project is asking for an 80 year use permit and there's no reason to believe that Rise Gold will constrain their mining to one small area for the entire amount of the time.

Meet-34

Consider this scenario. One day a homeowner turns on the tap and there is no water. It would be nearly impossible to prove that the mining operation caused damage because there is no plan to keep a reliable record of the well use or the well history. Neighborhoods would need to find immediate funding for water trucks and likely hundreds of thousands of dollars to connect to NID for a long term solution. And based on current estimates it would take

years to get--to restore that water service. And, furthermore, selling their home during that time would not be an option because a home without water is of no value whatsoever.

Meet-34

This is not the first time Nevada County has faced concerns about wells in the area of the mine. The last time it happened, however, the county provided a much more comprehensive system of safeguards for nearby residents. In 1996, Emperor Gold was granted a use permit to dewater the mine for exploration, which was--which required protections for wells in a designated study area.

Meet-35

In addition to the NID hookups for the homes on Bennett Road, it included multiple years of well monitoring, a community relations program, retention of an independent groundwater consultant, preapproval of all NID connection permits, and cash, bonds, and security to cover expenses for replacement water. All of this was done for a five year--for five years of

Meet-35

exploration. It didn't include 80 years of mining.

On behalf of myself and well owners in the vicinity of the mine, we respectfully request that the final report provide significantly better safeguards for well owners. The potential impacts to well

Meet-36

owners has been recognized by experts and these impacts must be addressed by CEQA. The final report must fully identify the potential impact area and articulate a complete set of safeguards. This county has done better for us in the past. Given the enormous scope of the project, we need a much more comprehensive plan for the future. Thank you.

GREENO: Thanks, Christy.

GERWIG: Good morning. My name is Katherine Gerwig [phonetic]. I live at

Meet-37

11147 Squirrel Creek Road in Grass Valley. I've done extensive traveling all over the country. I settled in Grass Valley because it's one of the nicest little towns I've

Meet-37

been in. I like it here and I'd like to stay.

However, the noise level, I don't think anyone in grass valley that lives here knows when the fair is here or doesn't know when the fair is here. And they stay below the noise level. You can still hear them and all those trucks. You can still hear them. Below noise level, fine, but not low enough. And we'll have to replace the roads as well because of all those roads--those trucks.

Meet-38

The iron, mercury, cyanide, and arsenic are important to be able to separate the rock from the gold, and will be used. Too bad Erin Brockovich isn't here today because if you want to drink that water after it's been purified, go ahead. That's going to be going down Wolf Creek, right in the middle of Grass Valley. And that's a little poisonous to me. And I'm sure you can find a DEIR where that may be good. It may be. Do you want to drink it?

Meet-39

The noise level, I mentioned that. I'm

Meet-39

trying to do this fast. The fault, at one of the first meetings we went to with Mr. Muscleman [phonetic] and his group showed a diagram with - - a big fault where they're going to be blasting. I said, "Mr. Muscleman, isn't there a fault there? Isn't that an earthquake fault?" He said, "Oh, it's not important. We won't put it on anymore maps. We didn't mean to put it on that map." Well, that will solve that. Right?

I've had people tell me they're-- they're having sinkhole problems on their property, their land right now. They're adjacent to his mining because the testing their doing. This--they haven't even started yet and they're already having sinkholes.

I'm sorry. This is not a good idea. I like this little town and I'd like to stay here but I can't stay here with all the dirt that's going to be there, with the new roads we have to put in, the noise levels. And

Meet-39

the jobs--sorry, the jobs are going to be truck drivers. They're going to import their own people. They're going to import their own food. It won't help grass valley. It will help them, not us. And will he continue it? I don't know. Thank you very much. I don't want this mine here.

GREENO: Thank you, Katherine.

GRANT: Hi there. My name is Kellan Grant [phonetic]. I live at 10006 Parkview Lane in Penn Valley. I'm a homeowner. I'm here to share my--share my grave concerns about the proposed DEIR which was supposed to provide critical real world information

Meet-40

to the Planning Commission and to the community at large about the real impacts of this proposed mine and that it will have on our air, on our water, on noise, and in general on our quality of life here in Nevada County.

These impacts are not theoretical. We have a lot of historical data about the impacts of hard rock mining, much of it from

right here. Concerns about these very real impacts are what brought me here today and I think a lot of these people. And yet the

Meet-40

DEIR, in an effort to provide--as an effort to provide real world data, is woefully inadequate.

It vastly underestimates the impact to local wells, certainly in the number of wells. Even the NID board expressed doubts about a number of wells effected as low as 30. It decouples the theoretical proposed cleanup of the Centennial site, considering

Meet-41

it a fait accompli, a separate matter, throwing the impacts of that site completely out the window. The noise pollution assessment takes into account initial construction but what about blasting, hauling, dumping 1,000 tons of wastewater and tailings a day?

The data in this report does not reflect reality. It has to be revised and

Meet-42

it has to be recirculated. We have data on how air quality affects kids lungs. We have

Meet-42

data on how mine waste destroys groundwater, destroys streams, contaminates. We also have a lot of data about Rise Gold and their history of broken promises, of fudged data, and of environmental disasters that they've left behind and just walked away from. We have data about their disregard for the concerns of local communities.

GREENO: We, we do need to keep this on the DEIR.

GRANT: Absolutely.

GREENO: Thank you.

Meet-43

GRANT: Look, the impact on groundwater alone, water is more precious than gold in Nevada County. It just is. And the impact on water alone warrants a reevaluation, a reassessment, and a recirculation of this report. We cannot get this wrong. If we get it wrong, it will be an absolute disaster not just for Grass Valley but for the whole county. The report does not reflect reality. It's inadequate and it needs to be revised. Thank you.

GREENO: Thank you, Kellan.

BAKER: Yeah. I'm Steve Baker [phonetic], 13975 Wings of Morning Drive up in Nevada--in Nevada City, top of Banner Mountain. I've lived there for 26 years on a well. I'm commenting on the risk to the private domestic water wells created by this project. My background is unique to the issue of private wells. I'm a California registered geologist, certified hydrogeologist, been doing hydrogeologic work for 42 years. Completed a ten-year groundwater study in our county, Nevada and Placer counties, and looked at the domestic well vulnerabilities. Also, I submitted the draft EIR comments for the Banner Mountain Homeowners Association back in 2009, when Emperor Gold attempted to open the mine.

Meet-44

Based on what I've read in the draft EIR, I am concerned about the community. Dewatering the mine and its impacts on domestic wells is currently, based on this draft EIR, undefinable, unpredictable.

Meet-45

Meet-45

There are some fundamental data sets that are biased, that were used and they're hanging their hat on. And the monitoring data is not long enough in duration and its resolution is not nearly good enough to be useful for answering these types of questions.

I'll first answer what's wrong or missing, and then we'll go into what we can do about it. Okay? Rise Gold has four data sets. They used the Emperor Gold's groundwater monitoring data, '95 to 2007. 2002 was missing. The problem is they only sampled water levels once a month. That's not enough. You need high resolution data to get any useable, reasonable information out of it. And you've got to remember this is an 80-year project. Okay? We need long data sets if we're going to make predictive opinions, provide predictive opinions.

Meet-46

The precipitation data and the water levels in the Rise Gold mineshafts, okay, they used daily precip data and then they

Meet-46

used 15 water level readings throughout a 16 year period of time and concluded that there wouldn't be an issue. Same problem, the resolution, the frequency of sampling, it's not long enough.

The computer numerical model, though you've heard about by some past people here, it's not the right model. It's the wrong tool. I mean if you--if you have a job that requires a hammer but all you have is a screwdriver, I think they use a screwdriver.

Meet-47

It doesn't help solve the problem. The mine, the numerical groundwater mines--or models are great for answering some of the questions on this project but not this question. They're, they're of no value.

We need details on this one. And what is missing is they use well completion reports and they use static water level readings. What they needed to look at was the pumped water level dips and the shallow most productive fracture dips. Those are the critical data points and that wasn't

even talked about, not even considered.

Lastly, Rise Gold, they followed the conclusions of the USGS back in 1984 regarding groundwater in fractures. And, and if you would reiterate that, 70--25% or more of the wells that were producing greater than five gallons a minute were actually below 215 feet. Thank you.

Meet-48

GREENO: Thank you, Steve.

MALE VOICE: Chair Greeno, may I just ask to check in and see what number speaker we are on for information for people outside of this room?

GREENO: You're--14.

BEAR: Commissioners and staff, I am Jim Bear [phonetic], 128 Sierra Blanca Court, Grass Valley. And I'm honored to see you again and I particularly empathize with you because as a former Planning Commissioner for Grass Valley I think you have a hell of a job ahead of you. I'm--I've been a scientist at Stanford Research Labs and Bell Labs, and have applied my experience to

Meet-49

evaluating the DEIR. I'm also a business owner in Nevada County.

Rise Gold is claiming that science and the DEIR proves their proposal is safe for Nevada County. Several scientists, including myself, find that to be false. Our extensive analysis of the DEIR concludes that numerous mitigation measures will not lower the impacts to less than significant as claimed.

Meet-50

For me, the most important impact is air pollution because it will endanger many people far from the mine, miles from the mine operations, just as wildfire smoke affects the whole region. While diesel exhaust will have unmitigable negative impacts, it is asbestos and silica that are most dangerous to us. Airborne asbestos leads to cancer and eventual death.

So there will be harmful--will there be harmful airborne asbestos? The DEIR finds asbestos in about 32% of the drill hole samples, represent--representing rock that

Meet-50

will be brought to the surface, but 19 drill holes providing 40 samples cannot possibly represent 2,085 acres of mineral rights. That's one sample per 65 acres. That's generalization from insufficient sampling. There's probably a lot more.

Unfortunately, asbestos fibers are very small, about five--about .5 microns. Being submicroscopic leads to harm. Asbestos cannot be filters, can travel indefinitely in the air, and penetrates deeply into the lungs. The DEIR mitigations treat asbestos as dust that can be kept out of the air by spraying water, washing vehicles, tarping the hauling trucks, etcetera.

The proposed mitigations are actually copied from the California Asbestos Airborne Toxic Control Measure which is for visible dust emissions. I suggest no one will see particles one millionth of a meter long. Dust is visible. Asbestos is not.

There are dozens of other issues such as the need for testing the three million

Meet-50

pounds of rock excavated every day. I conclude as a scientist and a 20-year county resident that air pollution from the proposed project cannot be mitigated. Thanks.

GREENO: Thanks, Jim.

Meet-51

SHAY: Morning. My name is Mike Shay [phonetic]. I live at 11069 Cedar Ridge Drive. So the mine is in my backyard. The other side of my backyard fence is the mine property. So I'm going to talk a little bit about noise. I know it's been covered but I'm going to give you some specifics about why the draft EIR is insufficient.

Meet-52

So according to the noise and vibration study that was used to create the draft EIR, figure three shows my house as number 28. Table 6 in that study says the ambient daytime noise at my house is 51 decibels. And according to the study, the engineered fill operation is going to take place 500 feet behind my house. And currently there's just forest back there. There's no

Meet-52

mechanical activity. There's no human activity. So the 51 decibels that I'm hearing has got to be from Brunswick Road because that's the only place that noise can be coming from.

So the study says the following equipment is going to be used to place the engineered fill. So diesel haul chucks-- trucks that are going to dump between 50 and 100 20 ton truckloads out of steel beds 500 feet behind my house, bulldozers, motor graders, excavators, compactors, water truck, a front-end loader, and mobile auger blending plant. And Table 17 of the study predicts that all of this equipment will generate only 47 decibels.

[Laughter]

SHAY: So, so that's, that's less than what I'm hearing now. I find that inconceivable.

And I'll go on. According to the noise and vibration study, the mineral processing will take place 2,000 feet from my house.

Meet-52

Table 6 says the nighttime noise at my house is 44 decibels. Well, I didn't know that. I thought it was quiet. I'm going to have to shut my window at night now because it's so loud. I didn't even realize it.

Table 22 has predicted the cumulative noise from all nighttime mine operations will between--will be between 26 and 29 decibels at my house. Once again, it's 44 decibels now with no mine, but when the mine is there it's going to be even quieter. Isn't that wonderful?

[Laughter]

SHAY: You can call me dumb, but I don't understand how hoisting over a half a ton of rock per minute--so if it's 1,000 tons per day, if you do the math, it comes out to a little bit over a half a ton a minute. They're going to take half a ton a minute, 85 feet above the surface, drop it into the steel lined concrete silo, then put it on a conveyor 335 feet to a processing plant, grind it down. And all of this is

Meet-52

going to be quieter than it is now. Doesn't make sense to me and I maintain that the noise study that this--these figures came from are, are inadequate. They need to be redone. Thank you.

GREENO: Thank you.

COLBY: My name is Ricky Colby [phonetic] and I live in District III. I did live in District V for 45 years and I want to tell you in my experience dealing with an underground gold mine called Siskon Gold Corp. Labor Day weekend, 1995, we heard the sound like an explosion. It rocked my house. A short time after the

Meet-53

Siskon deepened Grizzly Hills Well, the day they tested Grizzly Hill Well to see how fast it recovered, my well started having problems. On September 17th, in the a.m., I had horrible, undrinkable water. And by afternoon I had no water at all. So I'm that person that I was a well owner who turned on their tap and there was no water.

We had an Environmental Impact Report

that sounded a whole lot like this Environmental Impact Report. Siskon Gold Mine was always out of--out of step with their--the way they were supposed to handle things and they let it slide. This story goes on and on and on, and I can't tell you all of it.

But this mine is going to operate for 80 years. Just think what they can do. Siskon had one accident. It blew a hole in our aquifer, an F-16 fault. And they're going to go on for 80 years. How many accidents like that can they have in that 80 years? And how are they going to fix it? They're not. They're going to have a big accident like Siskon did. Then they didn't have enough mitigation money to cover all of our expenses. And they're going to pack up, go away. Siskon took out bankruptcy. We ended up having to clean up their mess.

Meet-53

The cost of water NID is going to raise just because of the drought, let alone the amount of money that they're going to take

for this. At least Siskon was able to plug the hole and some of the old wells come back and some of the new wells revived. And what they did when they revived is the clay turned to powder while it was being dewatered. And the heavy minerals, when the water came back in, rushed into our wells. And I had to go through chelation for two years for aluminum poisoning that filled my, my new well up. I had to have two filtration systems.

Meet-53

GREENO: We, we appreciate your comment. The project comment will come later. If you have anything else on the EIR, please present that at this time.

COLBY: Well, I don't think their water plan is adequate, basically. I, I think there's surprises and I think that my Planning Commission at that time didn't realize what kind of damage could really be done. And I wanted you to know that there can be...

Meet-54

GREENO: Thank you so much.

TURNER: My name is Martha Turner [phonetic] and I live at 10860 Dolores Drive, Grass Valley, supervisor District III. I'm a retired nurse practitioner, nurse midwife, and I am not, as Dawn Rogers [phonetic] referred to as a busybody. I've lived most of my--most of my time in Nevada County since 1960. I was a forest service firefighter as a young adult and in 2015 we lost our fire--our home, rather, to a forest fire. This--which makes this subject dear to my heart.

Meet-55

My DEIR comment today is condensed from ten pages that I've written as a written comment on the chapter of 4.13, titled, "Wildfire." And I request that the following matters be further reviewed by the Planning Commissioners before a recommendation is made to the Board of Supervisors.

I was not reassured by what I learned. The report suggests that the mine site is immune to dangers of a wildfire and yet

Meet-56

there is forest on both sides. And the Bennett fire in fact burned a number of acres on the Centennial site just last year.

The report minimizes the risk of fire in our region. In fact, there have been 16 fires in our--in Nevada County since 2015. The report does not adequately address how mass evacuation of residents, along with the additional 312 mine employees, will be handled.

Meet-56

Quite disturbing is a statement that in the event of a wildfire fire officials will request that the mine shut down. What sort of authority or enforcement is in the word "request?"

While fire--while truck traffic is recognized elsewhere in the DEIR as significant, in this part of the DEIR it states that the impact of truck traffic is less than significant in the event of a wildfire. This makes no sense.

Meet-57

There is no discussion in relationship to wildfire about the trucks carrying the

Meet-58

explosives through town, or the transferring of these explosive materials before they are stored underground. The report contends that the vegetation management plan become-- makes wildfire danger insignificant. Our home had a well defined defensible space and it still burned to the ground.

Meet-58

The report states that the presence of 24,000 gallons of diesel fuel on the site will have no potential for fire danger or environmental catastrophe, no potential.

Meet-59

It also states there will be less than significant risk of flooding, even though it acknowledges that mine tailings do increase water runoff. What happens to the homes located along Mill Street, that we see along Wolf Creek? We've all seen those backyards being flooded when the creek rises. Yet there is no consideration of the impact of an additional 1.2 to 3.6 million gallons of water each day going into the creek.

Meet-60

I ask that my--I focus this analysis on the chapter and along with common sense

Meet-61

Meet-61

tells me that what it's saying is not accurate. Thank you.

GREENO: Thank you, Martha.

HALL: My name is James Hall, HALL. I live at the intersection of Mink Court and Beaver Drive, just south of the mine site. I became aware of the arrival of Rise Gold into the area in the spring of 2017, when I was awakened at night by two loud explosions. Spent me weeks to find out that Emperor Gold was gone and we had a new company.

I spoke about noise problems that I was having in the fall of 2017 before this Board. They have been ongoing ever since then. My concern is lack of sleep and how it affects the body. Not mine so much. I'm 95 years old and I won't hear it much longer but my neighbors and children will.

It's a continuous, ongoing rumble under the house. I've attempted to contact my supervisor without any luck but I'm not quite sure of what the answer is. I'm not satisfied that Rise Gold says that they're

Meet-62

Meet-62

going to mitigate the problem since I've had the problem for five years and supposedly there's not even anything going on underneath the house. But it goes on, on the average of 12 to 16 hours a day on a nightly basis. And I think it's going to need to be stopped.

It's just going to be--if we're having this much trouble with no mining, I hate to think of what it will be when it gets on in the future. So I hope that this organization and the people can do something about it. Thank you, very much.

GREENO: Thank you, James.

Meet-63

PEROZI: Hello. My name is Gary Perozi [phonetic]. I live at 13997 Emerald Court in Grass Valley. I'm a well owner and my home is located above the Idaho-Maryland Mine mineral rights area. I've lived int hat peaceful and beautiful area for over 30 years and I'm also a member of the Wells Coalition. I live in District III.

After reviewing the DEIR well

Meet-64

mitigation plan, I'm concerned about impacts to my well and other wells in the area of the mine. The report provides protection for up to 30 wells along East Bennett Road but it doesn't lay out a mitigation plan for the few hundred other wells in the area. The report doesn't even acknowledge a risk to the other wells in the area.

Meet-65

The DEIR will--well mitigation plan states, quote, "All potentially impacted wells are located in the East Bennett Road area. Domestic wells outside this area will not be impacted." The re--end quote. The report fails to demonstrate that this statement is true. There can never be 100% certainty in a hydrogeologic model and what wells will and will not be impacted by dewatering of the mine. That's because the model is based on assumptions and predictions.

The hydrology predictions are a best guess effort because we really don't know for certain what the groundwater response to

dewatering in the mine will actually be, especially in fractured rock. Even the principal hydrologist for Itasca that worked on the hydrologic model for Rise Gold said in the February NID board meeting, quote, "With fractured rock there will always be uncertainty. And during my career there won't be any 100% confidence in predictions," end quote.

Meet-65

The DEIR is inadequate in that it does not sufficiently account for the uncertainty in the hydrologic--hydrogeologic models and assumptions, and fails to acknowledge the risk to all wells in the area. It also doesn't present an attainable plan on how to mitigate for those wells that fail, get contaminated, or are impacted due to the dewatering of the mine. We don't want a repeat of what happened in 1992 when the San Juan Ridge Mine hydrology report stated, quote, "Water wells and the water supply well surrounding the site are predicted to undergo very little or no impact to mine

Meet-66

Meet-67

dewatering," end quote. The hydrology assumption proved to be false and created disaster when three years later, the mining operation tapped a high pressure water-bearing fault line and flooded the mine and depleted groundwater.

Meet-67

GREENO: Thank you, Gary [phonetic].

HANSON: Good morning, members of the planning commission, staff, and members of the community. My name's Jennifer Hanson. I'm the general manager for the Nevada Irrigation District. I am here on behalf of the district as well as on behalf of our board this morning. We do have a comment letter that we will be submitting regarding the draft DIR, but we also thought it prudent to make our comments in person as well. The draft EIR did depict a potable water line being constructed in the East Bennett area in order to serve water to the 30 residents I did apply to be potentially impacted by the project. However, NID will also request that there is an

Meet-68

Meet-69

Meet-69

interconnection in the Whispering Pines area that was not contemplated in the draft EIR. And we would like to see that portion of the project be included.

Secondly, we have um, concerns related to the mitigation measures for the 30 properties that were identified to be potentially impacted through mine dewatering activities and specifically related to the mitigation measure related to requiring the applicant to pay for water consumption for those parcels.

Meet-70

In the water supply assessment, it was indicated that it was estimated that each one of those parcels utilized approximately .4 gallons per minute per dwelling. And in the draft EIR, the mitigation measure for consumption, for payment consumption is limited or capped at 400 gallons per day. And the .4 gallons per minute per dwelling is actually 576 gallons per day.

Meet-71

Additionally, we do not feel that it is appropriate that the mitigation measure be essentially expired at sale of

Meet-71

the property. And instead of running with the parcel owner, we would like the mitigation measure to run with the parcel itself.

We have additional concerns related to the estimated 30 wells that were estimated to be impacted through the water supply assessment as well as the hydrology work that was completed. As previous speakers have said, um all modeling is based off of a number of assumptions as well as data and

Meet-72

unknowns that have to be included into the model. And so we would like to see the extension of the area of impact to be addressed through requiring the project applicant to provide financial assurance or some type of surety, whether through money in escrow or through the um, securing of a bond to also address any wells that would be potentially impacted in the areas of Wood Rose, Greenhorn, and Beaver areas. We have estimated that this potential cost if these wells were to be impacted would be in the

Meet-72

$14 million range. So we therefore respectfully request that the draft EIR require a mitigation measure that the applicant secure a bond to pay for any potential impacts in that amount for the five-year dewatering period. Additionally, since the operation of the mine will far exceed the initial dewatering period, it would be prudent to also include--

[Crosstalk]

HANSON: Oh, my time…

FEMALE VOICE: Five minutes.

HANSON: - - five minutes. I'm told I get five more minutes.

GREENO: Two more minutes, yes.

HANSON: Two more minutes, two more minutes. I can talk fast.

GREENO: Thanks, Jennifer.

Meet-73

HANSON: We also request that the, okay, we also request that the groundwater management plan require that the monitoring wells also be placed in the area and be placed at the average depth of those wells.

Meet-74

And then lastly, our final comment is related to the Wolf Creek discharges. We do serve well over 700 irrigation customers, and obviously water quality is utmost important to us. But we also request that mitigation measure be placed within the draft EIR. That requires um, daily monitoring and public availability of water discharge data so that we can ensure there are no storm water impacts associated with capacity. There is limited capacity on Wolf Creek. And if we are not monitoring those discharges, it can easily become overwhelmed during a storm event. And with that, I sincerely appreciate your time, and thank you for the extra two minutes.

GREENO: Thanks, Jennifer.

Meet-75

HUCK: I'm short. Um hi, my name is Theresa Huck [phonetic]. I live at 11536 Lower Circle Dr. in Grass Valley. I am speaking to today on a different subject that is located in 4.7-1 in the summary table of the draft EIR regarding the impacts

Meet-75

of human health. There are significant and unavoidable impacts to human health that cannot be calculated by this draft EIR. I rented a home on the Lava Cap Mine site in 2010 when it was filed as a Superfund site. At that point in time, someone was supposed to knock on my door and tell me that I was living on such a site, but that did not happen. And my son and I as a result, ended up with life-altering mercury poisoning and will be living with that for the rest of our lives.

This draft EIR cannot possibly look at 80 years of mining and how that will impact human health. And the main and concise point I would like to make to you today is that we are no longer an industrial community that can continue to mine at the expense of the residents who live here. I would like to thank you very much for the effort you put forth and for honoring our rights as citizens. And I would really, really like to request that the draft EIR be

redone in whatever way, I'm not educated in these matters, to truly look at the impacts of human health, not only in dewatering of mines, but in groundwater modeling, understanding that a storm changing that can change the flow of mercury and arsenic, cadmium, chromium, and lead in our water. We are already living with that legacy, and we as a community do not know how to deal with the impacts from a legacy 100 years ago. So I ask you, please do not even reconsider this project until we know how to deal with that. Thank you.

Meet-75

GREENO: Thank you, Teresa.

NELSON: Hello, my name's Allison Nelson, and I'm a resident of District 4. I'm a biologist with a master of science, and I'm the director of Gold Country Avian Studies, so I respectfully request the full five minutes.

Meet-76

Um, the um, our organization focuses on avian research and education in the Sierra Foothills. The Idaho-Maryland Mine project

Meet-77

DEIR is deficient in that it does not adequately address significant impacts to the stretch of South Fork Wolf Creek that passes through Empire Mine State Historic Park and the meadow the creek transects, known as the Bennett Street Grasslands. More specifically, it does not address

Meet-77 significant impacts to the 98 native bird species that my organization has captured or detected in the grasslands, all of which are protected by the Migratory Bird Treaty Act. This list includes four rare special status species, including the critically endangered willow flycatcher. The DEIR is also deficient in that it does not address the simultaneous impacts of a 300-plus unit

Meet-78 housing development currently under review by the city of Grass Valley, which is proposed on Bennett Road between the Centennial site and the grasslands. The DEIR's biological surveys of the South,

Meet-79 South Fork Wolf Creek riparian area were also severely lacking. My understanding

from appendix F10 is that the only biological survey that occurred was a VES, during which two people walked the creek on August 29th, 2019. Not only is it likely that many amphibians were missed during this late hot dry time of year in a warming climate, but also there is no evidence that any bird survey was attempted. If so, bird vocalizations are almost nonexistent at that time of year, and locally breeding migrants could have already departed.

Meet-79

Since December 2016, I have run a year-round bird monitoring program in the Bennett Street grasslands, performed with a permit from the park and in conjunction with Bear Yuba Land Trust. The land trust holds a conservation easement on approximately 7 acres within the grasslands along South Fork Wolf Creek. At the grasslands, we perform detection surveys and run a monitoring station where we operate ten mesh nets to passively capture wild birds, then band and release them. The grasslands are a rich

Meet-80

biodiverse ecotone that connects a conifer-
covered hillside, a riparian creek corridor,
and a very wet meadow which drains from the
hill where the Centennial site is located.
At the Brunswick site, the project proposes
Meet-80 to put its untreated wastewater into a
vibrant pond rich with wildlife. After
treatment, it will be, the water will be
discharged into the creek, which flows
downstream through the grasslands, where we
run the monitoring program.

On page 471, the DEIR states California
black rail is the only special status
species that was identified as potentially
occurring on the sites. And the technical
memo for the biological resource assessment
Meet-81 states the habitat associated with South
Fork Wolf Creek does not provide suitable
habitat for other CESA-listed species. This
is absolutely incorrect. On at least 15
separate occasions, we have captured or
detected California special status species,
including yellow breasted chat, yellow

warbler, olive-sided flycatcher, and the critically endangered willow fly catcher, which as long ago as 2003 was estimated to have only 400 remaining breeding pairs. During four out of the past five years, we have captured more than seven willow flycatchers in the creek vegetation. In my NOP comment letter of August 2020, I listed three special status species observed in the grasslands, including willow flycatcher. And in March 2021, I also submitted to the county, to the county planning department a folder of all our California natural diversity database special status species submissions.

Meet-81

Therefore the DEIR is deficient because it does not acknowledge significant impacts to the, these special status species, and the analysis is also deficient because it did not consider relevant facts known to the county. Given that the grasslands are located between the Centennial site and the Brunswick site and across the street from

Meet-82

Meet-82

Meet-83

the proposed housing development, extensive additional studies need to be performed regarding the significant impacts that the project will have on the grasslands and the riparian corridor. These should include but are not limited to general surveys, general bird surveys, surveys of special status species, willow flycatcher-specific surveys during breeding and migration periods, research on impacts of temperature change and flooding that the creek may have on invertebrates, and studies on the effects of flooding on ground-nesting birds, of which there are numerous resident and migrant examples. Additionally, we have documentation of birds, bobcats, bear, coyote, mountain lions, and other wildlife moving freely between the grasslands in the area of the proposed housing development and the centennial site. And additional studies must be performed to identify the significant impacts that the additional traffic and noise created by the proposed

Meet-83

housing development and the mine project would have on wildlife, their migration corridors, and the aesthetics of the grasslands of Empire Mine State Historic Park.

Meet-84

I also want to clarify that a second meadow located on the Brunswick property also rich with bird life, and I have a photo here, uh lies directly to the east of the vibrant pond where the project will pump its untreated wastewater. Studies must be performed to determine if diverting water from this pond into a--

GREENO: Thank you, Allison. And uh, we will take ten more uh folks before we break for lunch, so if you would let the 11th person back know that we will reconvene, uh I'd like to do a 30-minute lunch break if that's acceptable to the other commissioners.

NELSON: I just want to let you know I have photographs of the - - and for all the commissioners, I have…

GREENO: Those will go in the EIR,

thank you, yes.

MALE VOICE: What number are we on?

GREENO: What number are we on? 23? You're 24?

GILLESPIE: I'm 26, and 25 is right behind.

GREENO: That's great, great.

GILLESPIE: My name is Becky Gillespie [phonetic], and I reside in District 1 at 14130 Banner Lava Cap Rd. I grew up in Nevada County and moved back here with my husband and children in 2016. I'm here today speaking on behalf of Earth Justice Ministries, a local nonprofit that brings a spiritual and moral perspective to bear on issues of our day and links concern for creation with concern for human well-being. We echo the concerns of everyone who is speaking out on the inadequacies of the current draft EIR. Today we focus on what is called aesthetics, the mine's cumulative impacts, and the need to repair harm done.

Meet-85

Meet-86

Aesthetics are downplayed as a concern in

the draft EIR, but beauty is a value. Beauty touches people's hearts and minds. It is Nevada County's natural beauty that brought so many of us here and that brings so many visitors, the sights, the sounds, the smells of this place, the taste and feel of clean water, the fish in the streams, and the wildlife. People come here to experience the beauty of the natural world, to experience a deeper reality that puts things in perspective. To many, that natural beauty is like church, reconnecting us to what is most meaningful in life. The draft EIR must adequately list in detail the mind's specific aesthetic impacts.

Meet-86

Mitigations listed in the draft EIR will not overcome the mine's cumulative impacts, which would work together to decrease our quality of life by increasing air and water pollution, dewatering wells, harming Wolf Creek, increasing greenhouse gas emissions, injuring plants and animals, raising noise levels, damaging roads, and yes, wounding

Meet-87

the beauty of this place. The final EIR must list in detail how these specific impacts act together and how Rise Gold addresses this cumulative damage.

Meet-87

Finally, there's still much damage to repair from the gold rush, including genocide committed against the Nisenan people and other nearby tribes. The earthen people were so damaged that the toxic legacy continues today. Healing from the past includes respecting the earth that gives us life, making reparations for harms done, restoring the land and air, and changing our ways so that we are in a right and good relationship with this place, its people, and creatures. We cannot heal from the past if we continue adding to the harms by opening this mine, thank you.

Meet-88

GREENO: Thank you, Becky.

KANE: Good morning, my name is Jeff Kane [phonetic]. I've lived in Nevada County most of my life. I'm a medical doctor, and I'm very concerned about air

Meet-89

quality. Our county's air quality as you might know is already terrible. Uh, the American Lung Association gives us an F grade for our ozone levels. We've all been, long been considered uh Sacramento's tailpipe as vehicle emissions there funnel to here. And wildfires, which will intensify, cause entire weeks that our air quality management district labels very hazardous. If you look at the DEIR table 4.3-19, it's on page 366, it's a list of toxic airborne substances that the mine will emit daily while all mitigations are in place. In other words, this is the best case scenario. Do the math, and you'll see that despite all mitigations, however effective, the mine will release 8.5 half million lbs. of substances known to be toxic and carcinogenic into our air over the next 80 years. We can't take this; we can't take this. Our mortality rate from chronic lung disease in this county is already double the statewide rate. One especially vulnerable

Meet-89

group is seniors, whose numbers are three times the statewide rate. Another vulnerable group is our children. They will absorb more toxic airborne pollutants than adults do because of their more rapid respiratory rate and their longer exposure during these eight decades. The report ignores impacts on the thousands of Nevada County residents who will be born during the operation of this mine and have no say in the issue.

Meet-89

The many mitigations that the DEIR specifies are too numerous for any agency to monitor or enforce or more importantly, to afford. In any case, the mining industry itself has a record of neglecting or circumventing mitigations as you probably already know. Again, we can't take this. The DER table 4.3-19 states that even if all mitigations are effective, the mine will significantly poison our air, inevitably sickening us. Nevada County cannot tolerate any additional air poisoning, thank…

Meet-90

GREENO: Thank you, Jeff.

ENGEL: Hi, my name is Larry Engel [phonetic]. I'm at 12116 Horseshoe Ln. Uh, that's above the mind that's underground in 2,500-plus acres that nobody's talking about sufficiently in the DEIR. Uh, they're going to remove my groundwater. This isn't an abstract question. Each of us on Banner Mountain owns our own groundwater. We have a right to compete for our water that's in the ground that they're going to ship 24/7/365 somewhere down the Wolf Creek, which is one property away from mine. Uh, I have filed a 120-page objection or am filing a 120-page objection, I'm waiting for some biology data, uh with 50 fatal flaws, and I'm going to mention just a couple of them. And I'm often using in that, which I urge you to read, the DEIR's own words against them particularly matched up against what they haven't talked about, which is the Rise uh Gold Corp. 10k and 10q they've filed with the SEC. They got to have consistent

Meet-91

Meet-92

Meet-92

messages, and if they're telling the SEC one thing and they're telling us something else in the DER, that's not good.

Uh, why consider my analysis? Uh, I'm a retired bankruptcy lawyer. Uh, I've worked at the, one of the nation's leading law firms with decades of experience in failed mines. I know as much about anybody as bankrupt mines. You want to know why there are 40,000 abandoned mines in California today that are on the EPA list?

Meet-93

Go check it. I can tell you, and they start with failed uh mines with unrealistic uh DEIRs that become EIRs. And there's no economic feasibility. I know you don't want to talk about economic feasibility, but the courts will when we get to that. Uh, the uh, let me hit the first flaw. I'm speaking quickly because I'm concerned about my time.

Meet-94

The, the draft uses hexavalent chromium. Nobody's talked about that, CR plus 6. Uh, you may remember the old movie the horror reality movie Erin Brockovich. They killed

Meet-94

Hinckley, California with hexavalent chromium. You know, so they showed you this morning cement paste that they're going to put in the mine to shore up uh the, the old mine and the new mine, 24/7/365 for 80 years they're going to use this toxic hexavalent chromium. They don't talk about that. There's not a single mention of that chemical in the hazardous section of the EIR. Why is that? Why are they hiding that? Uh, if you if you Google hexavalent chromium, you'll find an infinite number of horror stories. If you check the EPA website, there are hundreds of - -.

GREENO: Thanks, Larry.

PRICE: I'm Charles E. Price [phonetic], Charles Price.

GREENO: You're on, Charles.

PRICE: I'm getting an echo. Am I getting an echo? Uh, I'm at 12655 Little Deer Creek Ln. in Nevada City, not the city proper, but the county. Um…

GREENO: Charles, I was uh informed

that you have a song, is that right that uh…

PRICE: Yeah, I do.

GREENO: Brings the EIR question to uh music?

PRICE: Yes, and I, I just want to uh say a little statement before I perform it that it clarifies. Uh COVID generated a work, uh place experiment, and corporations and workers alike have seen the benefit from working at home. Now Nevada County is competing for these well-employed professionals and their families who are migrating out of the state's urban areas. I don't see this draft document addressing the effect of proposed mitigations in total on our county's overall quality of life uh, for its residents, attracted to visitors, and potential new residents. Grass Valley and Nevada City are the cultural heart of Nevada County. Please demand a study addressing the total effect of putting a big mining operation in that heart.

Meet-95

Meet-96

Sorry, I got to sit to do this, but I

Meet-96

ran my hand over a table saw and I can't play guitar like I used to, so now I'm playing slide on my lap oh. Uh, going to have to do it fast here. Taking years and years to recover from the terrible, terrible gold mining scars. Generations of good folks working together to recover this beautiful county of ours. They'll pollute our water, pollute the sky. Homes will lose value; wells will go dry. 43,000 gallons of water a day here where droughts often come our way. Toxic waste don't get bigger by the hour, another big drain of our electric power. Don't let--sorry, don't have the time to finish this.

GREENO: Thank you, Charles.

PRICE: If you uh, go to Charlie Price, uh the YouTube, you can hear it.

GREENO: We know where it is, thank you.

Meet-97

O'CONNELL: Hello, uh good morning commissioners. Uh, my name is Itera O'Connell [phonetic]. I live in District 1, and I've lived in Grass Valley for 20 years.

Meet-97

And I uh, travel on Brunswick uh, next to this proposed mine project at least twice a day, so I'm extremely concerned about the truck traffic that will be unloaded onto our, our street. This will divide our community, so the environmental impact report does not really address how this will divide our tourist section from a major industrial uh, endeavor.

Meet-98

So we currently have uh, this area zoned as light industrial, and they want to uh waive that to be a major industrial. To me it should have stopped right there. This is a neighborhood, and this shouldn't even be something we're dealing with but here we are. This is also Nisenan on land. It is sacred, and I didn't see any interview with the Nisenan tribe. I've spoken with the Nisenan tribe, and they're opposed to mining this gold and taking this out of the country and taking resources out of our sacred land. So um, I would like to see the uh draft environmental impact report address the

Meet-99

Meet-99

Nisenan people. Uh, and that is under the uh, section of cultural and tribal cultural resources. It's a little line in the draft EIR, but it's not really dealt with.

Meet-100

Okay, so we also have, uh the trucks are not listed under the aesthetic section, but obviously a truck every 10 minutes at minimum would be um, definitely not aesthetic in our community. Uh, they list

Meet-101

the evacuation of these people as not significant or less than significant, and I beg to differ that 600 people trying to get out of a mine in an emergency and unloading onto one of our uh, roads that would for an evacuation, would be a significant issue.

Meet-102

The height variance has already been decided, no, no larger than 45 ft., and they want to go 165 ft. End of story, not happening, get the hell out of here. We don't want a 165-story building in our community. Uh, and also we don't want lights all night in our community. And they talk about that as not being significant. So this will put our

Meet-102

community at risk, uh that's already suffering from decades of mining, and it's time to put an end to this project, thank you for your time

GREENO: Thank you, Itera.

COULTER: Matthew Coulter [phonetic], Nevada County. I'd like to give each of you a lead pamphlet, a couple of lead pamphlets that came out at the--hello, you guys there? Howdy. I'm here; I'm right here. I took my day to come over here, okay.

Meet-103

FEMALE VOICE: They can hear you.

COULTER: Yeah, but are they even watching; do they even care? And that's what I want to start out with. So here's a lead document for you guys. Grass Valley's water doesn't even meet federal lead standards as it is, okay. We want to keep dumping toxic shit into our environment.

Meet-104

Let's start with the meetings. No chairs, people sitting in the sun, many disabled elders, no parking. I watch the county stifle the citizens by doing this type of

Meet-104

thing and using attrition as a way to get rid of people that have a legitimate comment and a legitimate concern.

Much like the marijuana issue and the Centennial Dam issue with NID, this process is severely flawed. My personal history on Brunswick Road growing up, the spring for South Fork Wolf Creek started in our property there at Cedar Crest. Growing up, there were two 24/7 sawdust burners going at the mill. Would we consider doing that again? 'Cause we do need a logging industry.

Meet-105

But we probably wouldn't consider putting that stuff into the air. But here we are doing it. Exploratory drilling, while they were here just doing their practice stuff and just looking around for the mother lode. They were fined for water, air, soil, tree violations, noise. So they couldn't even do the initial process. You would think when someone would come in and want to open up something really big, they'd do something really good at first to like show how

Meet-105

capable they are. These guys screwed up even the exploratory drilling.

And then we go into local mine watch, Allison Ranch Road. I was the one that

Meet-106

reported all that toxic stuff running into the creek that enabled that project to be done on Allison Ranch Road. Water infrastructure, last night in Grass Valley,

Meet-107

a house had to be ventilated for several hours because of chlorine in the water because of a water faux pas that the city had by Memorial Park.

Our infrastructure is so antiquated and falling apart in this town, and we want to add more, more, more, more, more houses, more people, more traffic, more everything.

Meet-108

Go outside and look at the parking. And I just have a feeling that as the planning commission, this is a done deal 'cause I've watched this project for a long time with the previous owners too. And I watched NID put in infrastructure for it. I watched that development on Greenhorn go in, all the

Meet-108

stuff that's going to benefit the mine way before they even applied. And I watched the board of supervisors be literally giddy about this.

GREENO: Thank you, Matthew.

Meet-109

MACHADO: My name is Mark Machado [phonetic]. I'm currently residing in District 1 at 13640 Canterbury Dr., approximately 1 mile due east of the proposed Brunswick mine site on a welled 3-acre parcel with NID nowhere in sight. Professionally I'm a semi-retired general contractor and a licensed professional engineer in this state. I've lived here for 22 years now. While I feel the draft EIR is inadequate for a host of reasons, not

Meet-110

including the sheer absurdity of reopening a very large hard rock mine a mere 2 miles from the town center of Grass Valley, a town that has 13,000 residents, let's, let's compare that to when the mine was reopened in 1919 by Aaron McBoyle [phonetic]. Back in those days, there were 5,000 people in

Grass Valley. Interestingly, when he closed the mine in 1957, there were 5,500 people in Grass Valley, an increase of 500 people, obviously not a big boon for the coal mine. The draft EIR does not address any of the adverse, potential adverse effects of the gold mine on those 13,000 residents who live and breathe and have businesses and count on tourism to support their cause.

Meet-110

My main concern relates to the inadequacy of the draft, is water. The initial dewatering is estimated at 2,500 gallons a minute for 160 days. Doing the math, that equates to over one-third of a billion gallons of total water. After the groundwater, seepage will require continuous pumping of approximately a thousand GPM per the draft. That's per minute. In a month, that's over 43 million gallons a month, every month for the next 80 years.

Meet-111

Now my well. I live about a 20-minute walk from the site of this massive dewatering. The thought that this

Meet-112

dewatering is going to have no effect on my well professionally is just hard to believe. The draft EIR needs to better explain, better model, which is computer speak for no proof what's going on. Thank you.

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GREENO: Thank you, Mark.

DIETRICH: Reduce this down a little bit, I'm short. Good afternoon and thank you for taking the time to hear your constituents here in Nevada County. My name is Teresa Dietrich. I am the legislative affairs chair for the Nevada County Association of Realtors. We have five areas of concern regarding the draft EIR, first being water. Um, many people have been talking about water, and I certainly don't want to beat a dead horse. However, we're very concerned about uh, the fact that the water is going to be pumped out of the ground, which could cause subsidence. We didn't see any notations in the draft EIR addressing the potential for subsidence because of the water table being changed by

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all the dewatering.

Um, we're very concerned about traffic, and um that doesn't seem to be um, sufficiently addressed in the draft EIR. Um, specifically there's so much current traffic congestion, and we're wondering how that's going to affect uh, public services, emergency services, and schools and school buses. Um, the habitat and contaminants, we're really wondering how the amount for the bond for restoration was determined, and is that truly adequate to return that site to a natural and healthy state in the future. That's a big concern. Um, it doesn't seem like um, it actually says what that state would be in the draft EIR.

Additionally we're concerned about noise. Um, it didn't seem like the draft EIR really covered sufficiently the noise levels created by 24 hours of operation and all the truck traffic. And then um the electric, the electricity situation, um it, it doesn't seem like the draft EIR is

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addressing the need to decrease utility usage in Nevada County based on the climate action plan. And we'd like to know if you guys could ask that to be updated.

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And in closing, I just like to say that housing and workforce supply are not topics addressed in this EIR, yet the Association of Realtors encourages the county to ensure that they are included under further study in the economic impact report. We will be submitting um, a letter with more details, and we just want to thank you for, for contacting us for, with the further information after this meeting. Thank you so much.

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GREENO: Thank you, Teresa. All right, so we're at uh, we're at that point where we're going to uh, recess for lunch and bathroom and we will reconvene at 12:30.

[Short break]

GREENO: Okay, we will reconvene for the afternoon session at 12:32 if we can yeah, close that door, thanks Tyler. I'd

like to start out, I'll pause you just real quick please, thank you, um I'd like to start out by thanking everyone. Um the uh, the unique nature of uh, of the comments and everyone holding their comments to uh pertaining to the draft EIR, um that's really appreciated. And uh, and also the um quiet applause, it uh it's really kept the meeting on track, and, and we've gotten to hear from your team constituents, your constituent teams. Uh, so with that, we will, we'll press on.

GRIFFITH: My name is Gary Griffith [phonetic]. I've lived at 11010 Gold Hill Dr. for 23 years. I've worked as a teacher at Nevada City School of the Arts for 21 years. I'm currently on the board of Wolf Creek Community Alliance, and I've been the lead stream monitor for South Fork Wolf Creek for 18 years, the creek in question much of the time in this document. And our organization will be submitting detailed comments, but I just want to highlight a

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couple general points. The Wolf Creek headwaters in which this proposed project would take place is a crucial component of our watershed. We Wolf Creek Community Alliance are concerned that the DER is deficient in a number of ways. Two general comments. First, we're surprised that the cultural resources identified in the draft are all mining sites. Not a single pre-mining site is identified in spite of archaeological sites well known to the state park existing in the area of potential impacts as detailed in the draft and public maps showing the existence of Nisenan village sites on both the South Fork and Wolf Creek itself. The draft, that the draft simply records outreach to tribes without succeeding in actually consulting with them speaks more to the failure of the draft than to the absence of knowledge of important sites on the part of trial communities. The draft needs to adequately survey for archaeological and traditional

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sites and fully consult with local tribes.

Secondly, the environmental setting should be framed more accurately. The proposed project sits within areas with some of the highest biological diversity in the county. A network of undeveloped land provides heavily used wildlife corridors as mentioned by a previous speaker and rare refugia for significant species. Aquatic

Meet-122

resources continue to provide crucial ecological functions to the watershed downstream. Instead of being characterized primarily as disturbed industrial zones suitable only for further development, they more accurately should be seen as biological resources that though damaged by long history of mining, continue to be resilient and over time have shown remarkable ability to recover.

Meet-123

South Fork Wolf Creek is a perennial stream starting above Brunswick Road, not out of a metal culvert. The pond downstream is not a mere collector of storm water but a

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consequence of the natural hydrology of the valley and a productive biological resource. The wetland habitats at the Centennial site that the draft seeks to ignore are important hydrologically for the headwaters and contain species of special concern.

Meet-124

Further, as the proposed permit is for 80 years into the 22nd century, impacts should be fully analyzed for predicted change changes we'll see due to drought, wildfire, and climate change in those 80 years. Given the severity of that future, the criteria should be not just to minimize negative impacts, but to ensure the continued recovery and resilience of biological function--

FEMALE VOICE: Four minutes - -.

GREENO: Thank you Gary, thank you. The, the five-minute folks are all identified in advance, so if you if, if you think you want to have five minutes, we should probably know about it, should have known about it already.

Meet-125

STOUT: Okay, uh my name is Teri Stout [phonetic]. I live at 101 Bawden Ave., Grass Valley, and I have been a resident of Nevada County for uh, 46 years. Um, I'm a retired educator and uh with a BS in biology and a master's in renewable resources. So I'm following um, the opening for Wolf Creek Community Alliance that just happened.

Meet-126

Regarding biological resources, we see six areas where the impact should be changed from less than significant to significant. I'll address special status plant and wildlife species as well as riparian wetland and other sensitive habitats.

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Regarding the special status plant species, the draft does not adequately address potential impacts to Stebbins morning glory, chaparral sedge, finger rush, and Sierra brodiaea. The management plan fails to protect the endangered Pine Hill flannel bush. It's on the endangered species list for California. Botanical surveys do not take place during blooming

seasons and dismiss portable, probable I'm sorry, occurrence in spite of suitable habitat. The flannel bush management does not incorporate sufficient buffers, plans for treatment with prescribed burning, and to show that transplanting would be successful, does not address those at all.

Meet-127

Two, special status wildlife species, the draft does not consider impacts to monarch butterflies and showy milkweed, which are in really low numbers at this point and so important for us throughout the whole western side of the Rockies. Um, and both of them present, are present at the Centennial site, as you've heard about for the yellow-breasted chat and also the California spotted owl present close to the Brunswick site. It fails to adequately consider impacts to Foothill yellow-legged frogs and red-legged frogs, western pond turtles, Cooper's hawks, willow and olive-sided flycatchers, which you heard about this morning. Surveys are inadequate and

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mitigations for impacts to western pond turtles and raptors do not adequately protect breeding habitat.

Um and the third one I'm addressing, there'll be more uh to follow up then, the third area is riparian wetland and other sensitive habitats. The draft does not include the full length of South Fork Wolf Creek or the pond at Brunswick, at the Brunswick site for the aquatic or biological resources. It excludes impacts to wetlands as they currently exist at the Centennial site. It does not adequately address impacts downstream to South Fork Wolf Creek due to dewatering, including areas within the state park. Entire reaches of South Fork Wolf Creek are not studied for basic hydrology or biological resources. Benthic macroinvertebrates, BMIs okay, benthic macroinvertebrates, that's the, that's the food and…

Meet-130

GREENO: Yeah, thanks Teri. And, and uh public comment can be done in writing too

if you feel like you'd like to continue.

STOUT: Thank you.

CRAWFORD: My name is Josie Crawford [phonetic]. I live at 17627 Vintage Dr. in District 2. I'm the executive director of the Wolf Creek Community Alliance. I'm a biologist with a master's in biology, and I am an 18-year resident on Wolf Creek. Um, so uh addressing mitigation 4.4-4, the movement of native fish or wildlife. By not characterizing perennial reaches of South Fork Wolf Creek as being aquatic resources, the DEIR neglects to consider the movement of fish and other aquatic species within the full length of the stream. The level of impact should be changed to significant. Mitigation 4.4-6, cumulative impacts, the DEIR does not address the loss of forest or wildlife habitat or cumulative impacts due to chronic stress for species, air quality, noise, risk of system failure over time, wildfire, and climate change. The level of impact should be changed to cumulatively

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Meet-133

considerable.

Appendix C, reclamation plan 5.12, um the section removal and closure activities, very brief by the way, fails to address how Rise Gold will protect the community from heavy metal contamination once the mining company has ceased operations, which could happen in six months or 80 years. There's no plan and no way to mitigate for the

Meet-134

leaking effluent that inevitably leaks from underground tunnels into the creeks years after closure. When sulfides, which co-occur with gold, contact water and air, they form sulfuric acid, which leeches heavy metals from the rocks. Arsenic, manganese, iron, cadmium, and lead are the leading toxins. When the mines close, tunnels fill with water. Eventually the water and the

Meet-135

tunnels bust loose somewhere, we don't know where, we can't predict it, and begin draining into the creeks in difficult to predict places. Acid mine drainage is considered the most serious threat to

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streams. It doesn't matter how green the mining process. As long as the tunnels fill with water, they will leach toxic metals. The Idaho-Maryland Mine Empire Mine and North Star Mines operated for about a hundred years. Today, 68 years after the mines closed in Grass Valley, the community and the environment are still paying for what happens after those mines closed. There are brownfield sites all over the county from these hard rock mines. Magenta Drain, the Drew Tunnel, and Little Wolf Creek are three big examples of uh, how we have toxins in the soil and the water that are very, very expensive to clean up. The Idaho-Maryland Mine is currently draining water into Wolf Creek out of four sites on the Idaho-Maryland Road uh, with arsenic and manganese levels above acceptable range for recreational waters according to state standards. This mine will need, this water will need to be treated forever.

GREENO: Thanks, Josie.

KEAN: Uh good afternoon. I wrote good morning, but now it's afternoon. So uh thank you for this opportunity. Uh my name's Jonathan Kean [phonetic]. Um, my wife and I live in District 3 at 11741 Alta Vista Ave. Uh we also own two other properties in Grass Valley, and I also own a house in District 4 up near um, North Columbia. Uh, our place up there is on property adjacent to the now defunct Siscon gold mine. Uh, but I've lived and worked in Nevada County since 1970. I'm a licensed building contractor and owner of Kean Construction, in business for close to 50 years here. Um, I currently serve as president of the Wolf Creek Community Alliance.

Meet-136

So in getting ready to address you this morning about the DEIR and that you're uh, you are looking at and assessing its adequacy, um I looked at the staff report that you probably have before you. And a sentence jumped out at me. It's like on the,

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page two, and it's a sentence that's repeated in the DEIR also in the project description. And it's, when it's quoted, it says, "A new aboveground pipe would convey treated water from the water treatment plant along an existing dirt road to the planned discharge point at South Fork Wolf Creek." Well, um the reason that jumped out at me is that um, uh the pipe is an important pipe. It's the pipe that they're going to pump uh, put the water back into, into South Fork from, but it's not the pipe that I want to bring to your attention. It's the wording, existing dirt road, 'cause that is not a road, it's a path. Um, I know this area pretty well. Our organization has monitoring sites just upstream and downstream. For years before Rise bought the property, oh dear, I'm probably not going to have time, um uh lots of creek neighbors and creek lovers enjoyed walking and birdwatching on the trails in that area. Um, there are trillium, equisetum, and a

surprising orchid called rattlesnake plantain that are on this supposed dirt road. It's not a road. Um, at least that's what it was last time I was there, about three or four years ago, so I don't know if the applicant has since built a road there. Um, but if so, there would be permits available to see that construction. So why does the DEIR and your staff report call it an existing dirt road? Uh, whoever wrote those words apparently wanted it to sound like oh, no big deal, this area is already degraded, it's fine to just put a pipeline right there. It's a small detail, but it's indicative of many other passages in the DEIR that minimize or--so thank you very much.

Meet-137

GREENO: Thank you, Jonathan.

TUTTLE: Good afternoon. Dear planning committee and staff, my name is Anita Wall Tuttle [phonetic]. I live at 6 Rockwood Dr. in Grass Valley and was a business owner up in Nevada City for 28 years. I'm opposed to the reopening of the Idaho-Maryland Mine. I

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have reviewed articles in the local newspaper and have also checked those sections of the environmental impact report regarding special concerns of mine.

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When I came to Grass Valley 33 years ago, it was quiet and peaceful but had the desire to change the image in order to attract tourists and draw as a destination for those wanting a restful place to enjoy all the arts. It has been quiet successful but now we face a problem. In perusing the immense EIR, I found very little addressing the problems of noise and vibration which Rise Gold has hailed as significant and unavoidable.

Meet-139

They project that there would be a substantial temporary or periodic increase in ambient noise levels in the project vicinity and offer no ideas for mitigation. In regard to vibration, they propose a ground vibration monitoring program that should be implemented and additional protective measures be available.

The EIR does require mitigation in order to ensure that the aforementioned impacts are reduced to a less than significant level. I'm hopeful that the Board of Supervisors will carefully question this portion of the EIR. Our concerts, plays, and other programs depend upon quiet observance for happy audiences. Portions of the EIR are directly contrary to the standard of review stated in County Policy 17.14, and Policy 17.24. Thank you very much.

Meet-139

GREENO: Thank you, Anita.

PULMAN: My name is Fred Pulman [phonetic]. I live at 55 Rockwood Drive in Grass Valley. The prospect that a stunningly large list of mitigations in the draft Environmental Impact Report extended over 80 years will be consistently resolved is naïve and disingenuous. Mitigation is defined as the diminution of anything painful, severe, afflictive, or calamitous. The DEIR for the proposed Idaho-Maryland

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Mine identifies dozens of negative impacts that it claims can be mitigated. There are several that cannot, aesthetics, noise, and traffic, and section six, page seven, should be enough to prevent the project from moving forward.

Among those that the report claims can be mitigated are the generation of pollution emissions that would exceed Northern Sierra Air Quality Management Districts applicable thresholds, potential seismic hazards at the Brunswick industrial site, potential elevated arsenic levels, a possible

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significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, possible negative impacts related to water quality, and impacts exacerbating wildfire hazards. All these impacts are referenced in section six, pages five through seven.

The many presentations today reveal

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that the DEIR's mitigations are extremely inadequate. Allowing a ponderous extraction

within the--extraction industry within the city of Grass Valley invites a multitude of risk to the health, stability, and sustainability of our community. The risk

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to health and environment are numerous and include damage from toxic mining dust, diesel exhaust, and toxic residue such as mercury, cyanide, and lead in our downstream ecosystems.

Those living close to the mine will be forced to suffer the noise and congestion from 100 trips per day of trucks hauling

Meet-143

waste rock and incur well water depletion or perhaps even loss of their wells, wells. At their last meeting, the NID board members expressed their concerns of this becoming a bigger problem than the DER--DEIR presents.

As you deliberate on the DEIR's merits and shortcomings, please consider this as

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not just a Grass Valley matter but as a county matter. Our town--and I repeat, our town is a vital component of the county's financial wellbeing, one of its major hubs

for the arts and culture, and a launchpad for people who come to explore the county's natural beauty. Help keep it so.

Meet-144

GREENO: Thank you, Fred.

PAPANUK: Good afternoon. My name is Catherine Papanuk [phonetic]. I'm a resident of--on Footwall Drive, Grandview Terrace, Grass Valley. I'm adjacent to Bennett Meadow. First, I am extremely impressed by the caliber of our comments today. I think we have a lot of really talented people here in Grass Valley. I am not a scientist, nor am I a lawyer. So we're here today to talk about whether a specific business, the gold mining business, as opposed to any other business, is in the best interest of the citizens of Nevada County.

Meet-145

This is a heavy industrial, hard rock mining business and we're talking about 80 years, 80 years of 24/7 mine operation. Your children will live their whole lives with this, and their children will still be

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enduring the torment of this mine, still listening to rumbling below their house or the thunder of trucks carrying waste rock down the street. They will breath the toxic dust, listen to the nonstop crushing mill, drive on destroyed roads, watch habitats disappear, and our natural beauty fade.

Meet-146

GREENO: Catherine?

PAPANUK: Yes.

GREENO: You're addressing the project. Today we're just talking about the draft ERI. Is--are you going--getting to that?

PAPANUK: Okay. These are my concerns. First of all was the sulfuric acid going into the groundwater. I'm concerned because we--these guys are proposing to have the excavated rocks stored in two gigantic 21-acre and 37-acre flat-topped piles up to 70 feet high. That's a lot of sulfuric acid that that's going to generate. I don't know how you're going to control unless there's like a plastic liner under it or something. I don't see how that's going to be mitigated.

Meet-147

GREENO: We're just--but we're talking about the, the document today. The project will be reviewed later.

PAPANUK: Okay.

GREENO: And that would be the time for these comments.

PAPANUK: I don't see how there's going to be any mitigation to dumping 15 and a half valley--Grass Valley municipal swimming pools worth of water into South Fork of Wolf Creek. I don't believe it can handle that capacity. There's a lot of native grasses there that I don't think that the--as one other speaker said previously that wasn't included in the Environmental Impact Report of what's in Bennett Meadow and what's going to happen in Bennett Meadow.

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I'm concerned about who is going to take care of us after Rise Gold disappears and the person that started Rise Gold or the next person. And given these and other environmental concerns, I don't know how it's possible that a heavy industrial mine

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is of greater benefit to Grass Valley, Nevada County, than any other type of business.

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I--we, the people, assume all the risks, while those with no interest in our quality of life leave with all of the gold. I hope that your commission can...

GREENO: Thank you, Catherine. Thank you for modifying your comments to address the EIR as well. I appreciate that.

BLAIR: Hello. My name is, excuse me, Maryanne Blair [phonetic] and I live at 12182 Sunset Avenue, Grass Valley. I believe that's District III. And thank you for your patience with all of us today. I really appreciate all the previous comments.

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I bought my home in Grass Valley nine years ago and retired here less than a year ago. I moved away from the bustle of a large urban area to this lovely, peaceful community, to retire here. As a consumer, I spend my hard earned pension on property taxes, goods, and services in the area. I

Meet-150

care deeply about this community and I vote.

In my 15-year career in a large water agency in Santa Clara County, I worked as biologist and engineering technician, a field operations administrator, and a vegetation specialist. Literally boots on the ground through heat and cold, flood and

Meet-151

drought. I saw a lot of changes brought on by climate change to the creeks and the reservoirs during that time. My education in three degrees in science, including a master's degree in environmental studies, have taught me much, including how to analyze data and the conclusions drawn from them.

I will say flatly that the min--the analysis and the mitigation measures are not adequate in this DEIR. More specifically,

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when reading it, I was chagrinned by the subterfuge within it which is used to minimize impacts or flat-out deny them. For example, in lieu of mitigation for impacts on the Centennial site, there are frequent

references to remediation in the Department of Toxic Substances Report which other people have touched on which is not even published yet. The same goes for the economic impacts of the project. We are still waiting for that economic study which a conscious member of the Board of Supervisors requested.

Meet-152

I was also stunned by the convoluted logic used to justify the conclusions in the DEIR that many, many impacts are less than significant. They are not. In the face of climate change where air, water, and our very lives depend--are threatened even, even without this impactful project, there is no excuse for this.

Meet-153

Here are a few of the examples of the erroneous logic in this report. First by categorizing the first two years of the operation as construction and the following 78 years as operations, Rise Gold Corp would only have to purchase carbon offsets to mitigate for the carbon emissions for the

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first two years. After that, they wouldn't mitigate for any of the carbon dioxide they produce annually. Unacceptable.

What is really a slap in the face to us is that Rise Gold Corp's consultants think that this plan is acceptable, acceptable because the citizens of California have cut their carbon footprint since 2006, working hard to reduce carbon emissions and greenhouse gas in our communities. How dare they?

Meet-155

Meet-156

This DEIR mistakenly concludes that a few more decibels of noise in an area that is greater than what is currently tolerated seems acceptable with some mitigating measures. Decibels are measured in a log-- on a logarithmic scale, just like the Richter earthquake scale where on numeral higher on the scale is ten...

GREENO: Thanks, Maryanne. And, Maryanne, if you didn't finish, please submit in writing.

BLAIR: A lengthy one in writing.

GREENO: Okay.

BLAIR: Thank you.

Meet-157

CAPPA: Hello. My name is Paul Cappa [phonetic]. I reside in District III, at 12859 Bradford Drive, Grass Valley. I want to touch on a part in Chapter 3, page 33. And this would be the potable water line that's going to be ran to homes that may be compromised by the mine.

Meet-158

In the DEIR there is no mention of any backflow prevention devices that will be needed for every resident that accepts water from this pipeline to protect the water pipeline--potable water from being contaminated upstream of it. Within that, those devices will need to be tested, certified every year that they're working properly, maintenance, replaced, or whatever has to happen with them. And that should not go on the price tag of the homeowners accepting this water that they once didn't need before. And they also need to be protected from freezing, tree limbs falling

Meet-158

on them. So a cage would have to be built around all these devices.

Also, I don't understand why there's so much water that's going to be interjected back into Wolf Creek. The, the mine is going to be buying water from NID to use for toilet and sinks and showers. Why can't they use this treated water? Turn it back around and use it for their own facility. It makes no sense to me.

Meet-159

Meet-160

It should be in the acceptance plan. There were four different acceptance plan. They, they talked about the spoils of the rock and stuff coming out in different scenarios on what to do with that but nobody is talking about all this water. The water is the most precious thing there and nobody is talking about how to really conserve with the water.

Meet-161

I know a little bit about the plumbing and water usages. I'm a retired plumber. So that's why I chose to speak on this part where I feel like the DEIR report is

insufficient with its report. It, it seems like there's a section in there on the water usage of what the mine needs to use. It is a little unclear. If they could go back to that and revise it, and make it a little bit clearer for the known amounts of water that they're going to need outside of the weather that they're dewatering from would be good to know because to me it's very vague. And before you know it they're using a whole heck of a lot of water. Thank you.

Meet-161

GREENO: Thank you, Paul.

JOHNSON-VAUGHN: I'm Gail Johnson-Vaughn [phonetic], 11793 Lower Colfax Road, a 40-year resident of our county. I hold a doctoral degree in organizational psychology with a special interest in behavioral economics and the psychology of decision making.

Meet-162

You are tasked with an awesome responsibility to recommend to our Board of Supervisors whether this project sufficiently benefits our county to outweigh

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the consequences of the negative impacts now and for the next four generations. You have been provided with a draft EIR that fails to give you adequate analysis you need to make that recommendation.

Psychologist Daniel Kahneman was awarded the Nobel Prize for economics for his work on the psychology of judgement and decision making. He tells us that intuition cannot be trusted in the absence of environmental regularity. At no time in our human history has there been a greater absence of environmental regularity than what we're experiencing now.

Meet-163

The draft EIR relies on intuition in a number of ways. It is a sort of intuition that concludes that assumptions of environmental impact based on historical data are sufficient to predict the full negative impact of this project as we sit at the 11th hour of life threatening climate change.

It is the kind of intuition that argues

that although Dr. Lu [phonetic], the draft EIR expert hydrologist states that it is not possible to create a predictive hydrology impact model that takes climate change into consideration, it is still acceptable to base the EIR analysis of well integrity and water quality for the next 80 years on historical data that assumes a cycle of a few dry years followed by many wet years.

Meet-163

It is the kind of intuition that argues that it is acceptable to assume that the consequences of a project are not--the air quality consequences are not significant even when added to our county's already failing air quality, as has been previously discussed. It is--that it is acceptable to allow these negative impacts to exacerbate the impacts of climate change, even that we are now experiencing the unprecedented ongoing drought and horrific smoke smothering wildfires.

Meet-164

It is this kind of intuition that permeates the draft. The science supporting

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an EIR is only as good as the accuracy of its assumptions. Based on the greatest-- perhaps the greatest inadequacy of this draft is basing the analysis on a single set of assumptions rather than the multiple set of assumptions which take into consideration the continuum of possible and...

GREENO: Thank you, Gail. And, Gail, can you tell me what number you were?

JOHNSON-VAUGHN: 40.

GREENO: 40? Thank you. And is this 41 by chance?

VAUGHN: I'm 41.

GREENO: Perfect.

VAUGHN: I'm actually older than that now.

[Laughter]

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VAUGHN: My name is John Vaughn [phonetic]. I've been a resident of Nevada County since 1967. My wife Gail and I live at 11793 Lower Colfax Road. Our well is approximately 100 yards from the southwest edge of the Rise Gold mineral rights area.

We are District III voters.

The last ten years of my career I was the senior vice president of manufacturing and logistics at a nonprofit in Roseville with responsibilities including a distribution contract for the world's largest printer manufacturer, shipping millions printer parts per year all over the world.

Meet-166

I have many concerns with the draft EIR and am submitting my written comments today. One that stands out is the lack of inclusion and review of a previously approved use for the Idaho-Maryland site, which is the Nevada County Business and Industrial Center. As already approved and zoned, this alternative could include 54,000 square feet of business park, 242,000 square feet for service business and light manufacturing, and 238,000 square feet for industrial uses.

Meet-167

The draft EIR wrongly concludes a negative impact and rejects this alternative, assuming the impact would be the same or

worse than the Rise Gold mine. Unlike Rise Gold, in virtually all cases in the real world for the types of businesses that would actually locate there, the traffic would be comprised largely of passenger cars and small trucks operating in the daytime, mostly weekdays, and not 24/7. Diesel truck traffic would be substantially less than the 236 trips per day for the Rise Gold project.

Meet-167

The scale and location of this site would not support large distribution facilities, auto dismantlers, or plaining mills, as claimed in the draft EIR.

Meet-168

My written comments include more specific details about why the draft EIR conclusions regarding the business and industrial center alternative are inadequate. To reject this alternative without a more detailed review using real world scenarios and real world outcomes makes no sense.

Meet-169

You've heard "makes no sense" a few times today. I believe an adequate review will find that the business and industrial

Meet-169

center is in fact the environmentally superior alternative. This is the wrong project for Nevada County. Thank you very much for the work you are doing and for your time today.

GREENO: Thank you, John.

Meet-170

LYND: Hi. Thank you for this opportunity to bring forward concerns. I appreciate that you're here and that you're hearing us. My name is Debbie Lynd [phonetic]. I reside at 642 Partridge Road in Grass Valley. I'm a 34 resident of this county. I raised my two children here. I have a bachelor's degree in business management.

Meet-171

I won't repeat what has already been said but most of the concerns that have been brought up I equally share. I would like to bring one up that was not emphasized enough either in comments today or in the report. It's an economic impact of property values. I have the largest investment in my life in my home, as do many of the people that have

spoken here this morning. We have a realtor next door to us that has said already he is being impacted because he's having to disclose the potential for this mine and it's causing people to turn away. So I am concerned of what's going to happen to the largest investment that I have made in this county. Thank you for your time.

Meet-171

GREENO: Debbie, thank you and I appreciate the unique change to your script there very much.

HECHT: Good afternoon. Thank you all very much for being here. My name is Ricky Hecht [phonetic]. I am a homeowner. I live at 13641 Greenhorn Road. I'm a thousand feet from the mineral--from the mine entrance and my home is exactly over the mineral rights area.

Meet-172

I appreciate all of the comments that I've heard today. I have a number of concerns but I'm going to--I'm going to consolidate them. I also happen to sit as a Nevada Irrigation District Board Member. So

Meet-172

the comments that were made earlier by our general manager, she had to condense. And I wanted to add a couple other things for the purposes of this hearing.

The NID Board of Directors expressed--I have to find this now--expressed serious concerns that the number of impacted wells could far exceed the 30 estimated by the draft EIR. NID proposed that the applicant

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conduct a more extensive and robust well and groundwater monitoring effort prior to and during any dewatering. Should the number of private wells impacted exceed the 30 that the applicant is estimating, NID believes the applicant should guarantee and include in its proposed mitigation for potable water for each well that is impacted.

The draft EIR also includes a

Meet-174

mitigation measure to pay for consumptive water use for the parcels along the East Bennett Road that connect to NID or that would eventually connect to NID. However, the applicant we believe at NID--and this is

in our letter, that the applicant should cover the cost of the consumptive use for each impacted well for a period of 24 months after the project is complete or abandoned. I believe they wanted to pay until the property was sold. This includes the initial mine dewatering as well as the continued mine operations.

Meet-174

And in order to establish a baseline of the number and quality of wells outside of the East Bennett area, NID suggests the applicant undertake advances sampling of both water quality and production for the wells located in the Wood Rose, Greenhorn, and Beaver Lane areas.

Now, let's see where am I on my thing. Oh, I'm so sorry. There's a couple other things I wanted to bring up very quickly. One is fire evacuation routes. Okay? In the traffic study that the applicant did, it is so inadequate that the fire evacuation routes were not even mentioned in the traffic study. This is a big deal.

Meet-175

Greenhorn is--at Brunswick, that's a chokepoint. There's one way in and one way out. And that needs to be further sorted out in terms of the numbers of cars and employees that will be impacting that.

Meet-175

Lastly, I want to talk about collapsing tunnels. No one here has mentioned that.

Meet-176

GREENO: Thank you.

FLEMING: My name is Jan Fleming [phonetic]. I'm the President of Iron Horse Homeowners Association.

GREENO: Can you pull that down, Jenna?

FLEMING: Yes.

GREENO: Thank you.

FLEMING: My name is Jan Fleming.

GREENO: Or Jan, thanks.

FLEMING: I am President of Iron Horse Homeowners Association. My address is 130 Iron Horse Place, in District III. And I am representing the owners from Iron Horse Place.

Meet-177

With our homes located approximately one mile from the mine, we are specifically

Meet-178

addressing air quality, noise, and the likely release of hazardous materials. With respect with air quality, greenhouse gas emissions, and energy, the mitigation measures for construction do not include a specific time period. This could go on for many, many years. The construction stage should include a specific time period and substantial penalties for noncompliance.

Meet-178

Due to the complexity of the emissions standards and types of equipment allowed, the DEIR should include onsite monitoring by a representative of Nevada County to ensure compliance. All the specific mitigation items under hazards and hazardous materials include reports that must be submitted to Nevada County Planning Department prior to underground storage, transportation, or use of hazardous materials or explosives on site.

Meet-179

The mitigation measures should state that the mine shall be responsible for providing sufficient funds to Nevada County for review, approval, and oversight of all

Meet-179

of these activities.

The project will generate a substantial permanent increase in noise levels in the vicinity. If noise standards are exceeded, operation should cease immediately until

Meet-180

additional engineering controls can be implemented. Additionally, there should be specific, substantial, clearly defined financial penalties if standards are exceeded.

The DEIR should include an annual review of the project to ensure that

Meet-181

mitigation measures are in compliance with the most current environmental greenhouse gas and air quality regulations.

Additionally, rather than an 80 year agreement, there should be a full review in five year increments. Providing individuals

Meet-182

living near the mine to have some respite from the constant noise and vibration is important for both physical and mental health. We recommend that hours of operation be limited to eight--to 7--to 7

Meet-182

a.m. to 9 p.m. Thank you.

GREENO: Thank you, Jan.

FROMM: Hello. My name is Peter Fromm [phonetic]. I live at 14006 Liquidambar Lane, about a half a mile from the Brunswick site. So I'm really concerned. And I know a lot of people have talked about water and I'm going to continue that theme a little bit here because, according to recent

Meet-183

studies, the current megadrought is the worst it's been in 1,200 years. I'll let that sink in, 1,200 years.

It should be obviously but during a drought water levels in lakes, streams, reservoirs, and aquifers goes down. In addition, our friends at Rise Gold intend to remove water from the tunnels to the tune of millions of gallons per day. Show of hands. Who thinks this is a good idea?

GREENO: If, if you could keep it to the EIR specifically?

Meet-184

FROMM: The DEIR states because the rate of groundwater discharge and the rate

of groundwater recharge are generally within the same range, the groundwater in storage within the bedrock fractures is in balance and there should be no long term trends of increasing or decreasing groundwater levels outside of normal seasonal fluctuations. No increase or decrease, I don't think so.

When that water is pumped out, more water will backfill to replace it. And the source of that backfill will be the aquifers which feed our local wells. Rise Gold has offered to connect 30 properties to the NID system.

Meet-184

DIR--DEIR states if it is determining that mining operations are resulting in a significant impact to any wells, the project applicant shall be responsible for providing a comparable supply of water to such homes or business whose wells are significantly impacted and, if necessary, providing an immediate water supply.

I am betting that their idea of "immediate" and mine are somewhat different.

Meet-184

And while we're waiting for that immediate time period to pass, what do we do in the meantime? A lot of us are seniors on fixed income and cannot afford the alternative. I checked with NID to determine the costs and timeframe required to connect to their system. As it turns out, the cost is really high. In my case, approximately $150,000. And because of the multiple easements and right of ways required, the timeframe will be many months, if not years.

Meet-185

So all the affected homeowners are asked to subsidize Mr. Mossman [phonetic] and his environmentally destructive operation. And even though he's making the claim of a bunch of high paying local jobs, a suspect claim at best, guess who is really paying for them? That's right. It's us.

So if I'm being forced to pay for this folly, do I get a piece of the action? Don't answer. Thank you.

Meet-186

MERTZ: Good afternoon, Commissioners. My name is Kako Mertz [phonetic] and I'm a

resident of District I. However, today I'm here to speak on behalf of the South Yuba River Citizen's League, affectionately known as SYRCL. I'm also here to speak on behalf of our network of 3,500 volunteers and members.

Meet-186 SYRCL has been formally opposed to the mine since 2021, due to negative impact this project will have on our community and the environment. We're a community based organization focused on protecting and restoring the Yuba Watershed. We will submit written comments, so today I'll highlight just a few major flaws.

First, looking at the biological resources, the DEIR concludes many special status plants and wildlife are unlikely to occur in the project area but in many cases **Meet-187** uses outdated or flawed information such as surveys from the 70's or surveys that occurred outside of seasons where a special status species may be present or identifiable. It's unscientific and

Meet-187

unreasonable to conclude that a species has low likeliness to occur if underlying data is flawed. Many other conclusions were made without any site specific data at all.

Hydrology and water quality is another poorly analyzed resource in the DEIR. The hydrologic analysis only considers existing conditions but doesn't consider the planned additions of impermeable materials such as

Meet-188

parking lots and buildings, which means water would move faster through developed areas of the project site and have less opportunity to be absorbed into the soil. For an accurate understanding of project effects on hydrology, these changes should be accounted for.

Additionally, historic precipitation rates were used that didn't account for climate change. The science tells us that

Meet-189

our local hydrology in the Sierra Nevada's will change from snow dominated to rain dominated. Modeling efforts need to account for extreme variability, especially

considering the 80-year lifetime of this project.

Meet-189

Lastly, the water supply assessment is deeply flawed. First, the claim that Rise Gold would be a net water producer is false and misleading, and ignores the body of science that proves groundwater and service water are fundamentally linked. Together, these sources of water constitute the water bank for our community. With a large number of well owners per capita and continued drought in the county, mining activities are likely to have a major impact on water security in the region.

Meet-190

The assessment claims, without reasonable evidence, that operations would only impact 31 wells, while past analysis to reopen the mine estimated an order of magnitude more wells with an even smaller project.

Given these issues and numerous others, SYRCL asks that the Commissioners require more information where there are

Meet-191

deficiencies and reject any conclusions in the DEIR that are not clearly linked to the best available science and data. To protect our precious community, the environment, and the culture of Nevada County, please ensure all due diligence is done to understand the full extent of all potential environmental impacts. Thank you for your time today.

Meet-191

GREENO: Thank you.

KIRSTIN: Hello. My name is Suzie Kirstin [phonetic] and I work for REMAX Gold. I am a realtor. I live at 13233 Lost Lake Road in Grass Valley. And I have several concerns with the EIR. I'm going to mention a couple here and then I'll elaborate on those.

Meet-192

But, first of all, what's--it seems like it was grossly understated in terms of the environmental impact. And I'm going to give you an example. So, for example, in the EIR it does not identify Idaho-Maryland as a superfund site. And even though it's not an open superfund site, once you have a

Meet-193

Meet-193

superfund site status from the federal government, you're always going to be a superfund site. What happens is the DTSC comes out and does testing. And if for some reason you happen to be clean, then you can get rid of that status.

But we were in the process, the DTSC was in the process of testing the Idaho-Maryland superfund status when, you know, Rise Gold came out. And they decided to stop their process, thinking that Rise Gold would be working with--they went under some protection program to continue checking into its superfund status.

So my comments today--and I don't know if people realize this. We have a lot of superfund sites in our community today. And they're all residual effects from having tailings and water.

And once you have that superfund status, you have to disclose that for the life of the property. I've sold superfund sites before. It's not pleasant for the people

that live there. They don't get their full complement of, you know, price that they think. We have a lot of people in our community that this is their only nest egg. Their house is their only nest egg.

Meet-193

And so now, on top of that, you're going to be throwing--which I didn't even know it was 80 years until I got here today. That is unfathomable to me that we would consider doing 80 years of gold mining. But just the fact that you're moving to a place where they're going to mine for 80 years, your property value is going to go straight down. People are not going to put up with that because, A, it takes away from your life. Right? Your life expectancy when you look that up online, you're going to die sooner.

Meet-194

And, by the way, arsenic, when the gold mine opens, arsenic is in those parent rocks that they're going to crush to get that gold. And so when arsenic is--gets so refined, it's like asbestos. It's in the air. It's

Meet-195

Meet-195

in the water. It travels everywhere. You can't control it.

So what's interesting to me is that we're going to open a super--a known superfund site from the federal government and we're going to suck water in from all the water in the community...

GREENO: Thanks, Suzie.

ERWIN: Hello.

GREENO: Hi.

ERWIN: I'm--

GREENO: [Interposing] Addressing the, uh, EIR?

ERWIN: Yes.

GREENO: Okay.

ERWIN: Absolutely.

GREENO: Thank you.

[Laughter]

Meet-196

ERWIN: I'm Jeff Erwin [phonetic]. I live at 10407 South Ponderosa Way, Rough and Ready. Yeah. The, the DEIR obviously based on all the testimony I've heard today--I've learned so much today--is completely

fraudulent, I feel. At the very least it's a gross underestimation of the impact that this mine would bring to our community, not only our property values but also the health risks. I mean if any health risks would be acceptable, which they're not, you know, the DEIR does not adequately express those.

Meet-196

And the main thing for me is that it doesn't address the impact on the planet and on humanity as a whole. And so I've written a song that addresses that aspect of how it doesn't work. Here is a portion.

You might say your--you might say your mining claim is what everybody needs. Beneath your lying promises is a heart of your greed. We won't let you slip it into the ground beneath our feet, rape our land of treasures that our people sorely need.

Meet-197

Well runs dry and people are thirsty. Wells run dry and the people awake. Wells run dry and the people are thirsty. Wells run dry and the people awake.

Would you please do us the decency of

not pretending like you care when you fill our space with toxic waste and contaminate our air? Rivers have no memory of poison in their veins. We will fight for every drop till you abandon all your claims.

Wells run dry and the people are thirsty. Wells run dry and the people awake. Wells run dry and the people are thirsty. Wells run dry and the people awake. Wells run dry and the people are thirsty. Wells run dry and the people awake. Wells run dry and the people are thirsty. Wells run dry and the people awake.

Meet-197

It's time to put the planet back to the place where it belongs. Sacred righteous architect of each and every song. Take dominion exploitation and greed without remorse. Bring harmony and dignity and honoring our songs.

Wells run dry and the people are thirsty. Wells run dry and the people awake. Wells run dry and the people are thirsty. Wells run dry and the people awake. Wells

Meet-197

run dry and the people are thirsty. Wells run dry and the people awake. Wells run dry and the people are thirsty. Wells run dry and the people awake. Thank you.

[Applause]

GREENO: Thank you, Jeff.

Meet-198

JOHNSON: Good afternoon, folks. Mark Johnson [phonetic], Orion Way, Grass Valley. I am a certified HAZMAT competent person supervisor for the United States Federal Government. I'm also a retired plumber.

Meet-199

Serpentine is the state rock of California. This mine that is--where you are standing, where you are sitting right now is embedded with serpentine. It is the state rock. You crush serpentine, which is a form of asbestos. You crush this and you create dust clouds of asbestos, mesothelioma. There has been 30 billion dollars attributed for to mitigate patients of mesothelioma. How much will Rise Gold donate to this 30 billion dollar fund to mitigate mesothelioma? Zero for I see.

Meet-200

Hydrology report is flawed. It is nonexistent. This is the same hydrology report that they gave to the Siskon Mine which drained multiple wells and still did tremendous amount of damage because hydrology is not a science. It's guessing. It's assumptions. It's maybe this happens over here, this happens over there. Who knows? No hydrology report is adequate.

Meet-201

Transportation issues, new signals. Are you going to approve a place where more people are impeded in daily transit because of one industry?

Meet-202

The hauling of ammonia nitrate which is the same explosive that was used to bring down the Oklahoma city building years ago in a much smaller amount will be hauled on our roads way too often. One accident will destroy the whole entire community. Look what happened in Brazil just last month. Ammonia nitrate truck went up, hundreds of deaths, one accident.

Meet-203

Reduced extraction, are we supposed to-

-if we do not allow this to go over 80 years, are we supposed to go for 139 years? That's six generations. I don't think you can form a permit that will cover six generations.

Meet-203

The scouring of Wolf Creek, I'm also a member of Trout Unlimited. There go all my invertebrates. There go my hellgrammites. There go my, my mayfly nips. There go my trout. There goes everything along the creek. Millions of gallons that will scour Wolf Creek every year. And, again, asbestos, asbestos, asbestos, mesothelioma. Get used to that word because you will breath it. You will be breathing in the same thing that causes mesothelioma. Thank you very much for your time.

Meet-204

Meet-205

GREENO: Thank you, Mark.

TAR: Good afternoon, Commissioners. My name is Erin Tar [phonetic]. I'm the Executive Director of the Bear Yuba Land Trust. We're a local nonprofit whose mission is to protect and defend the natural and working lands of the Bear and Yuba River

Meet-206

Watersheds. We do this through purchasing land in fee title, and working with private landowners on conservation easements.

For our conservation easement properties, we are legally bound to protect the conservation values defined in our easements which are recorded on title with the property. So why are we concerned about this project?

Meet-206

We hold a seven and a half acre conservation easement on the Bennett Street Grasslands and South Wolf Creek, which is located approximately two miles downstream from the Idaho-Maryland Mine location.

GREENO: Erin, is this going to be just about the project or about the EIR?

TAR: The DEIR.

GREENO: Okay, thank you.

TAR: Yeah. The conversation easement is owned in fee title by state parks is part of the Empire Mine State Park. And it's also home to Gold Country Avian Studies - - Indian Station where research has been

conducted on resident and migratory birds for the past six years. The conversation easement contains documented occurrences of endangered and threatened bird species, and unique seasonal wetland habitats that the conservation easement and the land trust is entrusted to protect.

Meet-206

In reviewing the draft DE--or the draft EIR, we found several deficiencies in the analysis. The current environmental review of the proposed Idaho-Maryland Mine project puts our ability to accomplish our mission and protect the conservation values of Bennet Street Grasslands easement in legal jeopardy.

Meet-207

In reviewing the draft EIR, we noted that the document does not include an evaluation of impacts on documented protected wildlife species or sensitive natural communities downstream of the project, including our conservation, conservation easement, which will be directly impacted through changes in water

Meet-208

flows and changes in water chemistry of South Wolf Creek. **Meet-208**

We have a number of requests related to the updates to the DEIR that Kate Gazo [phonetic] will cover next and that our included in our comment letter which we will be submitting next week. Thank you. **Meet-209**

GREENO: Thank you, Erin.

GAZO: Good afternoon. My name is Kate Gazo. I'm the stewardship manager for Bear Yuba Land Trust. My professional background includes aquatic and biological impact surveys, natural resource mitigation, and conservation planning. **Meet-210**

As Erin mentioned, Bear Yuba Land Trust holds a conservation easement on Bennett Street Grassland which is located two miles downstream from the Brunswick Mine location. The determination of less than significant impacts presented in the summary of impacts table for protected species and sensitive natural communities is unfounded and needs to be reexamined. The geographic area for **Meet-211**

reviewing natural resources impacts is too narrow and needs to include impacts to natural communities and wildlife downstream of the project area.

Meet-211

We are specifically concerned about how increased water flows in South Fork Wolf Creek and changes in the water chemistry will affect communities and wildlife. More or less water in a system, particularly if the water has increased turbidity and/or heavy metals, influences what vegetation communities can exist and therefore what wildlife uses or doesn't use the area.

Meet-212

There is no surface water quality data disclosed in the report, even though it is reference in the South Fork Wolf Creek technical memo. Therefore, changes in water quality, surface water quality once the mine begins operations will be unknown because there is no background concentrations to compare to.

Meet-213

Another large flaw in the report that we noted is that it omits discussing impact

Meet-214

Meet-214

on multiple California Endangered Species Act listed species that have documented observations within the Bennett Street conservation easement, again two miles downstream from the Brunswick Mine location.

As Allison Nelson [phonetic] previously mentioned prior in the meeting, an endangered bird, the Willow Flycatcher, and several other protected state birds were observed within the easement. These were not discussed in the report or disclosed, disclosed.

The easement also contains suitable habitat for the state listed as threatened Foothill Yellow Legged Frog, and we have also observed bear, deer, mountain lion, and numerous other wildlife species using South Fork Wolf Creek.

Impacts to protected species and sensitive vegetation communities such as the unique seasonal wetland within our, our easement are not adequately assessed in the DEIR. And therefore the less than

Meet-214

significant impact determination is unfounded.

We request for the biological assessment to be revised to assess impacts to Endangered Species Act listed species such as Willow Flycatcher and Foothill Yellow-Legged Frog, and to include analysis on downstream wildlife and sensitive natural communities, and not just the two mine locations, and for baseline surface water quality sampling data including heavy metals to be included and disclosed to the public. Thank you for your time.

GREENO: Thank you, Kate.

Meet-215

DEVINE: My name is--my name is Judy Devine [phonetic] and I live at 12--12900, uh, State Highway 78--174. And I am concerned with increased traffic in that--in that area and affecting the children. I live near a daycare. They have to breath this--these pollutants in the air. I'm also--the neighbors walk very regularly in that area. They will have to be breathing

this air. They will have to be listening to the loud noise, the vibrations in the ground. They're already having problems with vibrations whenever the trucks are going past, the big trucks.

Meet-215

So I think, you know, if any of you were living in that area, you would not be voting for this because it would be affecting your property value, your air quality, and of all things you might just have a life that you wished you hadn't.

GREENO: Thank you, Judy. And just a reminder, we are not taking action today and the action will be taken further on down the road. And then it will be a recommendation. It won't be a vote as much as a recommendation.

Meet-216

WHITEHEAD: Good afternoon, Mr. Chairman and Planning Commission and staff. I am David Whitehead [phonetic]. I live in District III at 100 Bawden Avenue in Grass Valley. I'm a registered civil engineer with a 28-year career in public service. I

want to thank the Planning Commission and county staff for our work on the Rise Gold project. You are fulfilling your duty to inform the public about the details and impacts of this project.

During my career, I worked on hundreds of public works projects. Every one of those projects required an Environmental Impact Report--an environmental document in compliance with CEQA. I know how challenging your job is, especially under the scrutiny of so much public involvement. Thank you for your skill, your knowledge, your experience, and the balanced--balanced judgment you bring to our community.

Meet-216

The greenhouse gas section of the DEIR is inadequate. I've submitted a more detailed commentary letter but I just want to point out a couple of things I noticed as a read the greenhouse gas section of the DEIR. I reviewed the GHG section of the DEIR because I believe that climate change is one of our societies most pressing

Meet-217

challenges. That is why I helped form the Nevada County Chapter of Citizens Climate Lobby and Education. CCL interactions with local citizens and elected officials, helping bring awareness about climate change to our community, the State of California, and the USA.

So first I would call your attention to the executive summary of the DEIR, specifically the statement that Rise shall retire carbon offsets equaling 2,664 metric tons of CO2 equivalent, which is found on page 223. This number is curious because it does not agree with the calculated figures presented later in the analysis section of the DEIR. There, the figure presented is 2,344 metric tons, a difference of about 320 metric tons.

It's not clear what accounts for this discrepancy but I would like to note that the estimated values and the tables in the analysis section of Chapter 4.3 are presented as having a high degree of

Meet-217

precision, to six significant digits. This level of hyper accuracy is probably not appropriate for calculation of estimated quantifies of GHG emissions given the underlying quality of data.

Meet-217

Second, I would call your attention to the actual calculations of GHG emissions presented in the DEIR and one of the proposed mitigation measures. If you look at the tables of calculated values, you see a focus on annual GHG emission production. What is not included is a calculation of the total GHG emissions produced over the 81-year life of the project. So I ran the numbers using only the numbers provided by Rise Gold. The project is estimated to produce over 700,000 metric tons of CO2E.

Meet-218

As far as mitigation goes, Rise Gold proposes to purchase and retire carbon offsets in the amount of 2,444 metric tons. They propose not to mitigate 700,000 metric tons. Therefore, Rise Gold proposes to mitigate just .35% of the total GHG's

produced by their project.

A reader of the DEIR who is knowledgeable of climate change and threats of catastrophic impacts on life on earth might conclude that such a proposal is not in agreement with these challenges and our growing knowledge of climate change impacts that we face today.

Meet-219

GREENO: Thanks, David.

WHITEHEAD: Thank you.

GREENO: Thank you.

NEFF: Good afternoon the good people of Nevada County and our representatives who sit before us here today. My name is Forest Neff [phonetic] and I first became a resident of Nevada County in 2007. I currently reside in District I at 13220 Cement Hill Road.

Meet-220

My concerns with the draft EIR pertain mainly to the inadequacy of the methodology used to assess the potential impacts on air and water quality. Those inadequacies include an unrealistic geographic and

Meet-220

temporal scope of the impacts and a failure to properly address existing impacts from previous mining in the area that may be exacerbated.

Given that these issues have been discussed at length by our community members here today, I would like to focus on this Board's consideration of that questionable report. I would like to remind the Board that while it is your duty and obligation to consider the expert evidence and reports brought before you, including this draft EIR and the concerns of environmental groups and community experts, that obligation is secondary to your sworn duty to represent we, the people, your constituents whom you see before you today.

Meet-221

Over 400 community members have come today to express their oppose to this project. I ask that you recognize that overwhelming consensus of dissent in your constituency as you proceed in the review and consideration of this project at large.

Meet-221

Thank you.

Given that I have a few minutes remaining, I would also like to speak on behalf of Gold Vibe Kombuchary, a local multimillion dollar business in the Loma Rica District less than a mile from the proposed site who depends on quality air for the production of their product. They would need to probably implement massive cleaning systems that I doubt Rise is planning on paying for to be able to produce their product at the quality that it's currently being made once the air quality does go down.

There are other issues, of course including the noise and water quality, yada-yada-yada. You've heard plenty about all of that. They may be sending a representative by later but I would like to mention that on their behalf as well. Thank you.

GREENO: Thank you, Forest. And the-- I'll take this moment just to make a note on something Forest said on the project. The, the Planning Commission is really the

judiciary branch of, of the county. The supervisors vote on behalf of the--of the constituency. It's our job to focus on whether or not it's legal if things are representative and, and correct. So just to--it's kind of splitting hairs but just so that we understand the executive, legislative, judicial kind of piece of this. Thank you.

MURPHY: Good afternoon. My name is Maryanne Murphy [phonetic]. I am a real estate broker and lawyer from Nevada City. I live at 13268 Woodstock Drive, Nevada City.

The application at issue is an 80-year plan to mine gold within claimed mineral boundary rights. The DEIR does not address what happens to the properties within the mineral rights boundary and to the impact to quality of air, water, and land, and noise, and as a fire hazard to those properties if Rise Gold mines them. And an 80-year permit would tend to indicate that would be the intent.

Meet-222

Meet-222

Instead, the DEIR refers generally to no divided neighborhoods. I submit that if an 80-year plan works out, there will be divided neighborhoods and displaced neighborhoods. And you will not see the same Brunswick basin surrounding us all in an area where gold mining left in the mid-twentieth century, in an area where we have developed to residential and commercial enterprise, and doing it successfully.

Meet-223

So the picture would be to examine the effects from mining under the developed and existing commercial and residential properties which may even include the airport and Dignity Health. As to the fire specifically, the DEIR seems to say that there is no very, very high fire risk. It seems to have a different mindset on what it means to be blasting every day for 24/7 or the opportunity to blast under people's homes for that 24/7. And what risk that might be to an incoming fire.

Take, for example, the Colfax fire that

advanced on 174. I wonder what the DEIR would say if they assumed that that fire would have hit the, the mine fully operational with all of the combustible stuff that it will have to be an ongoing concern. What different steps would need to be taken to mitigate that risk, to mitigate the devastation of that risk potentially to all the communities and the evacuation routes?

Meet-223

Thank you for your time. I really hope that you give a good, thorough review of all of the facts. It is very remiss as to what the DEIR has done. Thank you again.

GREENO: Thank you.

NELSON: Okay. Good afternoon, Planning Commission. My name is Megan Nelson [phonetic]. I'm a business owner, a home owner, and a voter living on East Broad, Nevada City.

Meet-224

The first thing--sorry, the first thing I'd like to request about the DEIR is that there is another one. We're by no means

Meet-225

ready to go to a final impact--Environmental Impact Review with the amount of shortcomings in this one.

Meet-225

One of the things that I think really should be included is a noise analysis at the property boundaries. That is per the county ordinance. So for them to say they're not going to do that doesn't follow your guys' own ordinance already.

Meet-226

I'd also like to see some additional exploration into the fire risk with the quantity of explosives being hauled biweekly and some statistical car crash information in conjunction with that. Not only how it could potentially be a huge fire hazard but the proximity of residences to the Highway 174.

Meet-227

I think we also really need to see a lot more research about seismic effects and potential tunnel collapses particularly under the airport, which is where we launch all of our aviation, basically, for fire suppression.

Meet-228

Meet-229

Let's see. Also, mineral rights and how they apply under the 27,000 acres or 900 private parcels in relation to soil depth and what those vibrations are going to do to people's homes, foundations, and the structural calculations.

Meet-230

Let's see. Okay. So 4.8-2C, which is apparently adopted by the BOS already, predicts--addresses the prediction at 10% well reduction and it talks about mitigation for that based on the 10%. So it's not considered dangerous. That's only taking the mining project into consideration. It's not taking the continued drought conditions over the next 80 years which could potentially put it in the 20% dangerous zone for homeowners and their well.

Meet-231

Additionally, downstream has not really been addressed, not only Wolf Creek but the Bear River, the Sacramento Delta, and the Bay. And when we look at cultural resources in relation to the theme of floodplain, down that channel there are a lot of holes that

Meet-231

have not been addressed.

Sorry. Thank you, guys, for hearing us.

GREENO: Thank you, Megan. Hey, Megan, what number were you?

NELSON: 75.

GREENO: 75, thank you.

NICKELS: So I'm 88. Is there anybody before me?

GREENO: Let's go 88. You're ready.

LAWRENCE: I'm 81.

NICKELS: Go ahead.

GREENO: All right.

NICKELS: Or do you want me to go?

GREENO: Yeah. Well, you're ready. Go for it. And we'll get 81 up there in the group.

Meet-232

NICKELS: Thank you. Hi, my name is Robin Nickels [phonetic] and I live at 19525 Copper Road in Nevada City. I grew up here and after spending seven years at college I came back because I've traveled around the world and around the country, and haven't found a place I'd rather live. And I think

Meet-232

that a lot of us agree but I don't think that will be the case if you--if the county decides to go forward with opening of the mine.

Meet-233

A major flaw I see in the DEIR is the fact that the baseline against which the environmental, social, and economic impacts are to be measured is proposed to be a future date after Rise Gold has started work on the Centennial cleanup site. This essentially allows Rise Gold to establish their own baseline and write their own litmus test by modifying the site prior to beginning mining operations as they have already begun to do. They have already denuded the area of one the proposed dumpsites and it looks like a moonscape. What more will they do before establishing their baseline?

Meet-234

The DEIR proposed cleanup of the Centennial site to a level of exposure acceptable for industrial and commercial use but not residential use. I wonder why

anyone would consider it to be acceptable for the workforce to be exposed to harmless levels of contamination eight to ten hours a day. Most people spend more cumulative hours at their workplace than at home. This standard would also forever exclude the possibility of residential use of the site without taxpayers having to clean up the mess left by the mine.

Meet-234

We are already having to clean up the messes left by the mines from a hundred years ago. And what about the neighborhood surrounding the site? Polluted water, air, and soil runoff won't stop at property lines.

The DEIR proposes to mix the toxic chemicals with Portland cement to prevent water quality impacts. Binding toxic chemicals and tailings in cement only offers temporary containment. Cement leeches and degrades with exposure to water and caustic chemicals. Any building inspector or active realtor knows that minerals in cement will leech out of the cement with water intrusion,

Meet-235

evidenced by the white dust in high water marks on building foundations. Cement septic tanks have an expected life expectancy of only 25 years. And if exposed to chemicals used in chemotherapy, for example, they can degrade to the point of failing within a couple of years.

Meet-235

Per the DEIR, Rise Gold will not be held responsible for the completion of the cleanup of the Centennial site. They will, however, be allowed to add tailings to the toxic waste site to 50 feet high. The DEIR fails to identify who or what entity will be responsible for cleaning up the toxic mess remaining after 80 years of production.

Meet-236

Item 1.4 allows for the cleanup of the contamination of the Centennial site to be completed after the end of the lease with the Idaho-Maryland Mine project. The DEIR also seems to allow Rise Gold to sell the property prior to completion of cleanup. Again, this absolves Rise Gold from the responsibility of cleaning up the toxic

Meet-237

Meet-237

waste mess it creates.

The report states that the traffic problems...

GREENO: Thank you, Robin.

LAWRENCE: Afternoon, members of the Nevada County Planning Commission. My name is Bill Lawrence and I live at 10201 Ridgeview Drive, which is just outside of the city limits. My career--well, I've lived here for 11 years. My career has been in public environmental health. I've worked internationally, almost ten years in Africa,

Meet-238

23 years Seattle King County Public Health where I was the section manager for environmental hazards. And I was director of environmental health here from September of 2013 to April 2014.

I come before you today with some severe reservations about issuing this permit. I trust that you've read the draft report and I trust that you've also taken good note of all the presentations that have come before me and will come after me.

I'd like to present about five or six arguments against the permit. The first one may not be in the draft EIR but I would suggest that we contact the CEO of Rise Gold as this individual once headed up a company in British Columbia. This company was called Banks Island Gold and as I understand it there are some serious issues up there. Find out what went wrong. Find out why there's still continuing litigation going on in British Columbia. Would you want to entrust this large project with an individual who heads a junior mining company?

Meet-239

GREENO: Bill, I got to--I got to hold you up there. We're, we're getting off onto something other than what we're here for today.

LAWRENCE: Okay, thank you. Number two, this mine is located on the very edge of the city of Grass Valley. Trucks will be hauling fuel, chemicals, explosives routinely to this mine. There was recently

Meet-240

Meet-240

a horrific mining accident in West Africa, in the country of Ghana. A motorcycle collided with a truck carrying ammonium nitrate. There was an explosion. Several people died and several buildings were demolished. Could this happen in Grass Valley? Why not? We have tons of motorcycles.

[Laughter]

Meet-241

LAWRENCE: Number three, Rise Gold claims with pride they will not be using mercury or cyanide. However, they will be using many other chemicals, some of which are flammable, some of which are toxic, and some of which have the properties to bioaccumulate in the environment. There is no real precision in the draft EIR...

GREENO: Thank you, sir. So let's see. Bill was 81 and what number are you?

SNODGRASS: You want to know my number?

GREENO: Yeah. Do you know it?

SNODGRASS: Social security or PIN?

GREENO: Did you get one or are you

without? It's fine if you're--if you don't have one.

SNODGRASS: Yes. I have the magical number of 101.

GREENO: Okay. Wow, all right.

SNODGRASS: Okay. Good afternoon. I'm Randall Snodgrass [phonetic]. I live in District I. I see this as a theater, a judicial theater. As you said, your job is in the judicial. I see that I am a public defender. Today I see the case being the People of Nevada County versus Rise Gold Draft Environmental Impact Report. I have one simple piece of evidence to offer for you today. It's this poster.

Meet-242

I want everyone to see this. This is a--this is sign that's mounted in Memorial Park, right in Grass Valley, right next to the children's playground. There's fencing on both sides that permit--that keep access away. I'll read you what it says.

"Warning, Aviso de Peligro, stream water may be hazardous. Avoid contact with

the water. Do not wade. Do not drink. Do not eat fish from this stream. Do not handle sediment. This stream drains through the Empire Mine, California's largest gold mining operation for over 100 years. The water and sediment contain residual metals and chemicals that may be hazardous. The State of California is working to clean up this stream but at this time please avoid contact with water."

Meet-242

We have a toxic stream in Grass Valley. Okay? 66 years after the closing of the Empire Mine, 66 years. So I am addressing the draft Environmental Impact Report. I don't think it adequately supplies information, strength of mitigations that would guarantee the health and safety of the people of Nevada County. That's my case.

And I think that you, as the judicial officers, will be making a verdict. You'll decide and you'll send your verdict to the judge, the judge being Nevada County. You have an auspicious responsibility as we all

Meet-242

Meet-243

do. This is not an indictment that I speak against Mr. Mossman. This is an indictment against the draft Environmental Impact Report.

So the strength of the mitigations is questionable. The actual insurance of can these mitigations be guaranteed can be equipped by sizable requirements of cash bonds out front to cover these possible damages. Thank you.

GREENO: Thank you, Randall. We're going to take a--

SNODGRASS: [Interposing] Wait, excuse me. I have a poster for each of you. Okay? Can I give these to someone?

FEMALE VOICE: Shelly.

SNODGRASS: Okay.

GREENO: And we're going to take a 15 minute recess for bathroom and comfort.

FEMALE VOICE: Comfort - -.

GREENO: You comfort, clearly not ours.

[Music Playing]

GREENO: --to order at 2:15 from its

recess. And continuing with public comment. If there is anyone who is outside watching this on TV and you wanted to come comment, please come at this time. And, sir, what is your number?

FOSTER: I have good news, 93.

GREENO: 93? And there may be people without numbers and that's okay. It's public comment without numbers now. Go ahead.

Meet-244

Thank you. My name is Bob Foster [phonetic] and I live at 122 Iron Horse Place, which is just off Bennett Road and is within the city of Grass Valley. And I'm happy to be here and share my thoughts with you. The first thing I want to say is thank you for your service. This is not an easy gig and the, the process that, that we're embarked on here doesn't work without you. So on my behalf and the behalf of many others I'd like to say thank you.

Meet-245

And I'm a lifelong outdoorsman. I grew up on a stream that is very, very similar to

Meet-245

Wolf Creek. So, in approaching this, my thoughts about this proposed project, that's my particular concern, is, is the area on, on water and water quality, which is basically Chapter 4.8 of the DEIR.

I have read the entire DEIR. I have been over the water quality section numerous times and I find the DEIR to be completely inadequate in respect to many areas in the water quality area. And I recognize that the, the science with respect to water and water quality is difficult. And in my particular view, the science with respect to water and water quality is quite speculative.

And I find the DEIR in, in numerous regards with respect to the water quality area to be entirely speculative to the point where it is probably misleading.

Two areas that I'm going to--of the many areas of my concern that I'm going to address. And that is, number one, what happens when there is no longer compliance with water quality standards in this

Meet-245

project? The, the whole plan that is formulated and reviewed basically is-- assumes that there will be compliance all the way along. There is nothing with respect to what happens when there is no compliance. And the plan is completely inadequate in that respect.

I suggest that you send this back to the--to the planners and get more information on what happens when there isn't compliance - - with respect to the - -. And I have specific questions on that which I will submit in writing.

GREENO: Perfect, and you will get a response to those questions as well. And they will be part of the final EIR in addition. Thank you, Bob.

Nobody outside there, Tyler? Okay. We might have come to that time.

FEMALE VOICE: Do you wish to speak? - - everybody was polite and nice and quiet.

GREENO: Okay, one more. We talked him into it.

Meet-246

BAKER: Hi there. My name is Gary Baker [phonetic]. I was here for another matter upstairs and we just noticed that the Commission hearing was going on. And I'm just asking for a moment because, you know, I sent in written comments on this environmental document. You know, it's 1,100 and some odd pages and I read them all.

Meet-247

There unfortunately were not appendices available, you know, to download or to review. And it's kind of, you know, difficult to get around and go to the library to read the appendices which is very different than what was provided to us during the cannabis EIR three years ago. That one, I submit, is some 800 pages of written comments. So I thought my eight pages this time was a little bit more abbreviated.

Meet-248

However, I still had some concerns, you know, related to the project, specifically related to the traffic and the inability to determine if the truck traffic was actually

included in the environmental review because there's three different conflicting statements in the traffic portion of the document. And one of those statements said that truck traffic was not included in the evaluation.

Meet-248

And the second issue that I had recognized in reviewing this document was the visual impact. I didn't understand why you needed 165 foot tower. Nor could I understand how the environmental document did not address buildings which could be 45 feet in height being sided on pads that were being graded as part of the mining operations such as hauling the material off to build the pads. And so but the environmental, you know, document and all the exhibits were just showing the visual impact of just the pad and they neglected to show what that impact would be with a 45-foot building on top of it. And those were my two significant comments on the document and those are all included in the responses

Meet-249

Meet-249

I sent off a couple months ago. And thank you for the time. And I've never finished early yet and...

GREENO: There you go. Thanks, Gary. Okay. Seeing no further folks looking to comment, I will close public comment at 2:22.

[END NEVADA COUNTY PUBLIC COMMENT HEARING_IDAHO-MARYLAND MINE_3.24.2022]

C E R T I F I C A T E

I, Brandi Chamberlain, certify that the foregoing transcript is a true record of said proceedings, that I am not connected by blood or marriage with any of the parties herein nor interested directly or indirectly in the matter in controversy, nor am I in the employ of the counsel.

Signature:

Date: May 2, 2022

C E R T I F I C A T E

I, Anne Edelmann, certify that the foregoing transcript is a true record of said proceedings, that I am not connected by blood or marriage with any of the parties herein nor interested directly or indirectly in the matter in controversy, nor am I in the employ of the counsel.

Signature: Anne Edelmann

Date: ___ May 3, 2022_____

DEIR MEETING

Response to Comment Meet-1
Please see Master Response 1.

Response to Comment Meet-2
The commenter provides introductory and background information regarding the Communication Environmental Advocates Foundation and expresses general concerns regarding the adequacy of the DEIR, but does not provide specifics. Thus, a detailed response is neither possible nor required. Please see Master Response 1.

Regarding air pollution, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about water quality, please see Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Meet-3
The commenter states the technical analysis, particularly related to air quality and hydrology, is inadequate, but does not provide enough detail to formulate a response. The commenter's opinion is noted for the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Meet-4
Please see Chapter 1.0, Section 1.3, of the DEIR and Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

Response to Comment Meet-5
The comment is a conclusory statement and refers to a written comment letter from the Communication Environmental Advocates Foundation dated March 30th. The comment letter referred to is included in this Final EIR as Group Letter 7, and responses to the comments therein have been provided.

Response to Comment Meet-6
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-7
With respect to concerns regarding groundwater, effects on nearby wells, and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Please also see Responses to Comments Grp 21-4 and Grp 21-110.

Response to Comment Meet-8
The groundwater model does not assume that the rock is homogenous and includes changes in hydraulic conductivity with depth, geological units, and faults. Please see Chapter 4.8 of the DEIR and Appendices K.2 and K.3 of the DEIR and Master Response 14 - Adequacy of Groundwater Model. Please also see Responses to Comments Grp 7-69, Grp 21-4, and Grp 21-110.

Response to Comment Meet-9
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-10
Please see Response to Comment Ind 648-5.

Response to Comment Meet-11
Please see Response to Comment Ind 648-9.

Response to Comment Meet-12
Please see Response to Comment Ind 648-22.

Response to Comment Meet-13
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-14
Please see Responses to Comments Ind 831-6 and Ind 831-23 regarding fugitive dust mitigation, and Response to Comment Ind 831-3 regarding emissions associated with blasting and implementation of the Asbestos Dust Mitigation Plan. Master Response 23 - Adequacy of Sampling – Asbestos discusses the adequacy of asbestos sampling. The commenter's request to include additional air quality monitoring stations has been noted for the record.

Response to Comment Meet-15
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-16
Please see Response to Comment Ind 617-5.

Response to Comment Meet-17
Nighttime noise is analyzed in Chapter 4.10 of the DEIR and was determined to be less-than-significant, according to the applicable thresholds of significance, after mitigation. Please also see Responses to Comments Grp 21-130 and 21-131.

Response to Comment Meet-18
Please see Response to Comment Ind 685-8.

Response to Comment Meet-19
The comment is introductory and provides background information regarding the County's Energy Action Plan. The comment does not address the adequacy of the DEIR.

Response to Comment Meet-20
Please see Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Meet-21
Please see Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Meet-22

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-23

Please see Master Response 5 - Discharge to South Fork Wolf Creek, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells. In addition, please refer to Impact 4.8-1 of Chapter 4.8, Hydrology and Water Quality, of the DIER. As presented therein, the DEIR has already concluded that the project may have a potentially significant impact on water quality and has identified mitigation measures to address this potential impact. The mitigation measures include a requirement to submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin. The NOI shall include evaluation of potential constituents of concern and demonstrate that the water treatment plant design shall successfully treat mine water to meet the water quality standards and treatment goals. The proposed water treatment plant is designed to remove iron and manganese and arsenic if it were present. Additionally, the DEIR's analysis, including the water sampling and conclusions regarding water quality, were prepared by water quality experts, and then reviewed by the County's independent water quality experts, who concurred with the conclusions. It is noted that Mitigation Measure 4.8-1(e) has been revised. Please see Chapter 3, Revisions to Text, of this Final EIR, for the revised text.

Response to Comment Meet-24

Please see Response to Comment Ind 664-18.

Response to Comment Meet-25

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-26

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Meet-27

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-28

The comment lists several concerns related to the analysis included in the DEIR, including impacts related to surface water quality, groundwater, air quality, greenhouse gas emissions, energy use, noise, and vibration. However, the level of detail provided is insufficient to allow for a detailed response. The commenter's concerns have been noted for the record.

Regarding concerns about water quality, please see Master Response 35. Regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding air pollution, including toxic air contaminants such as asbestos, as well as electricity consumption, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Also see Master Responses 21 and 22. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Response to Comment Meet-29

As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternative analysis in Section 6.2 of the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis given that they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail. (See DEIR Section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers.

Response to Comment Meet-30

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Meet-31

The County has determined that recirculation of the DEIR is not required as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met.

Response to Comment Meet-32

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-33

Please see Response to Comment Ind 129-1.

Response to Comment Meet-34

Please see Response to Comment Ind 129-2.

Response to Comment Meet-35

Please see Response to Comment Ind 129-3.

Response to Comment Meet-36

Please see Response to Comment Ind 129-4.

Response to Comment Meet-37

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-38

The comment does not address the adequacy of the DEIR.

Response to Comment Meet-39

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 2.

Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding effects to Wolf Creek, please see Chapter 4.8 of the DEIR, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Form Wolf Creek. Please see Master Response 29 – Near Surface Workings, regarding sink hole concerns.

Faults in the area are identified and addressed in the DEIR – see Chapter 4.6, Geology, Soils, and Mineral Resources.

Response to Comment Meet-40

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-41

The commenter expresses general concerns regarding the project, but without further specificity, a detailed response is not possible.

Regarding effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Please refer to Master Response 4, Cleanup Project is a Separate Project Under CEQA, for a discussion related to cleanup of the Centennial Site as the environmental baseline.

Impact 4.10-3 of Chapter 10, Noise and Vibration, of the DEIR includes an evaluation of operational noise associated with the proposed project, including blasting, traffic, and water treatment. As described therein, with the implementation of Mitigation Measure 4.10-3, the impact would be reduced to a less-than-significant level.

Response to Comment Meet-42

The County has determined that recirculation of the DEIR is not required as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met.

The commenter expresses general concerns regarding air quality and water quality, but without further specificity, a detailed response is not possible. Air pollution is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Meet-43

The commenter expresses general concerns related to groundwater impacts, but without further specificity, a detailed response is not possible. Please refer to Master Response 1 - Non-EIR/Administrative Issues and 14 - Adequacy of Groundwater Model.

Response to Comment Meet-44

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-45

Please see Response to Comment Ind 736-1 and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Meet-46

Please see Responses to Comment Ind 736-2.

Response to Comment Meet-47
Please see Response to Comment Ind 736-3.

Response to Comment Meet-48
Please see Response to Comment Ind 736-4.

Response to Comment Meet-49
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-50
See Responses to Comments Ind 353-1 through Ind 353-15, particularly Ind 353-1, Ind 353-5, and Ind 353-9.

Response to Comment Meet-51
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-52
See Responses to Comments Ind 585-2 through Ind 585-5.

Response to Comment Meet-53
The comment does not address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Meet-54
The commenter expresses general concerns related to the proposed project, but without further specificity, a detailed response is not possible. Please refer to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Meet-55
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-56
Please see Responses to Comments Ind 548-3 and Ind 548-6, as well as Master Response 5 - Evacuation Zones and Master Response 6 – Wildfire Impacts.

Response to Comment Meet-57
Please see Master Response 5 - Evacuation Zones and Master Response 6 – Wildfire Impacts.

Response to Comment Meet-58
Please see Responses to Comments Ind, 548-19, Ind 548-13, and Ind 548-15.

Response to Comment Meet-59
Please see Response to Comment Ind 548-21.

Response to Comment Meet-60
Please see Response to Comment Ind 548-22.

Response to Comment Meet-61
The comment is conclusory and has been noted for the record.

Response to Comment Meet-62
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Meet-63
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-64
The commenter expresses general concerns regarding impacts to wells, but without further specificity, a detailed response is not possible. Please see Master Response 1 - Non-EIR/Administrative Issues.

With regard to impacts on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Meet-65
Please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Meet-66
Please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Meet-67
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-68
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-69
Please see Response to Comment Agcy 10-1.

Response to Comment Meet-70
Please see Response to Comment Agcy 10-4.

Response to Comment Meet-71
Please see Response to Comment Agcy 10-6.

Response to Comment Meet-72
Please see Responses to Comments Agcy 10-9 and Agcy 10-10.

Response to Comment Meet-73
Please see Response to Comment Agcy 10-9.

Response to Comment Meet-74
Please see Response to Comment Agcy 10-11.

Response to Comment Meet-75
Please see Response to Comment Ind 671-1.

Response to Comment Meet-76
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-77
Please see Response to Comment Grp 13-2 and Grp 13-6, and Grp 13-7.

Response to Comment Meet-78
Please see Response to Comment Grp 13-18.

Response to Comment Meet-79
As discussed in Master Response 30 - Biological Study Technical Adequacy, the site (including the pond within the Brunswick Industrial Site) has been subject to extensive biological surveys, peer review, and analysis in the DEIR. Please see Response to Comment Grp 13-2 and Master Response 38 – Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Meet-80
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-81
Please see Response to Comment Grp 13-2 and Grp 13-6, and Grp 13-7.

Response to Comment Meet-82
Please see Response to Comment Grp 13-11 and Master Response 37, Birds and Raptors.

Response to Comment Meet-83
Please see Response to Comment Grp 13-7.

Response to Comment Meet-84
Please see Response to Comment Grp 13-5.

Response to Comment Meet-85
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-86
Impacts related to aesthetics is addressed in Chapter 4.1 of the DEIR. As noted in Chapter 4.1, Aesthetics, of the DEIR, according to the court ruling in *Preserve Poway v. City of Poway* (2016) 245 Cal. App.4th 560 [199 Cal.Rptr. 3d 600], community character is separate and apart from aesthetic impacts and, thus, is not a CEQA issue. Rather, the analysis of aesthetics, pursuant to CEQA, is limited to tangible, physical evidence that a project is visually inconsistent with the surrounding community (rather than a psychological "feel"). Therefore, the analysis presented within the DEIR appropriately focuses on potential physical changes to visual composition of the project sites and surrounding area, rather than subjective natural beauty.

Response to Comment Meet-87
The comment expresses concerns related to the analysis of cumulative impacts, but does not provide specific details for which to respond to. Please refer to the Cumulative Impacts and Mitigation Measures section of each technical chapter of the DEIR for a discussion of cumulative impacts related to each CEQA topic. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2 – Social and Economic Impacts.

Response to Comment Meet-88
The comment does not address the adequacy of the DIER.

Response to Comment Meet-89
Please refer to Responses to Comments Ind 332-1 through Ind 332-3.

Response to Comment Meet-90
Please see Responses to Comments Ind 332-4 and Ind 332-5.

Response to Comment Meet-91
The comment is introductory and expresses general concern related to the evaluation of groundwater included in the DEIR, but does not provide details for which to respond to. Please refer to Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Meet-92
The comment does not address the adequacy of the DEIR. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Meet-93
The comment does not address the adequacy of the DEIR. Social and economic impacts are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-94
Please see Response to Comment Ind 254-1 and Ind 254-3.

Response to Comment Meet-95
Quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-96
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-97
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Please also see Response to Comment Ind 295-5.

Regarding concerns about increased truck traffic, please refer to Chapter 4.12, Transportation, of the DEIR.

Response to Comment Meet-98
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-99
Please see Response to Comment Ind 295-4.

Response to Comment Meet-100
The commenter expresses general concerns regarding the aesthetic impacts related to truck traffic, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Impacts related to aesthetics are addressed in Chapter 4.1, Aesthetics, of the DEIR.

Response to Comment Meet-101
Please see Response to Comment Ind 295-3.

Response to Comment Meet-102
Please see Response to Comment Ind 295-7.

Response to Comment Meet-103
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-104
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-105
The comment does not address the adequacy of the DEIR. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Meet-106
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-107
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-108
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-109
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-110
The commenter expresses general concerns regarding adverse effects on residents, but without further specificity, a detailed response is not possible. Please see Master Response 1.

Response to Comment Meet-111
The commenter expresses general concern related to the volume of dewatering proposed, but without further specificity, a detailed response is not possible. Please see Master Response 1.

With respect to concerns regarding effects on nearby wells, please see please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Meet-112
With respect to concerns regarding effects on nearby wells, please see please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Meet-113
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-114
Please refer to Master Response 29 – Near Surface Workings and Subsidence.

Response to Comment Meet-115
Please see Response to Comment Grp 15-7.

Response to Comment Meet-116
Please see Response to Comment Grp 15-9.

Response to Comment Meet-117
Please see Response to Comment Grp 15-10.

Response to Comment Meet-118
Please see Response to Comment Grp 15-11.

Response to Comment Meet-119
Please see Response to Comment Grp 15-12. In addition, economic concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-120
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-121
Please see Response to Comment Ind 266-2.

Response to Comment Meet-122
The commenter expresses general concerns associated with the environmental setting presented in the DEIR related to biological resources, but without further specificity, a detailed response is not possible. Please refer to Master Response 1 - Non-EIR/Administrative Issues. In addition, please see Responses to Comments Ind 266-11 and Ind 266-16.

Response to Comment Meet-123
Please see Responses to Comments Ind 266-12 through Ind 266-16.

Response to Comment Meet-124
Please see Response to Comment Ind 266-14, Ind 266-22, and Ind 266-39.

Response to Comment Meet-125
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-126
The comment introduces concerns related to biological resource impacts and does not address the adequacy of the DEIR.

Response to Comment Meet-127
Please see Response to Comment Grp 32-6.

Response to Comment Meet-128
Please see Response to Comment Grp 32-7

Response to Comment Meet-129
Please see Response to Comment Grp 32-7

Response to Comment Meet-130
Please see Response to Comment Grp 32-8 and Grp 31-56.

Response to Comment Meet-131
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-132
Please see Response to Comment Grp 31-56.

Response to Comment Meet-133
Please see Responses to Comments Grp 31-63 through Grp 31-66.

Response to Comment Meet-134
Please see Responses to Comments Grp 32-11.

Response to Comment Meet-135
Please see Responses to Comments Grp 32-11.

Response to Comment Meet-136
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-137
The commenter expresses general concern related to the wording choice included in the public comment meeting staff report, and does not address the adequacy of the DEIR. Please see Response to Comment Grp 31-62.

Response to Comment Meet-138
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-139
Please see Responses to Comments Ind 24-2 and Ind 24-3.

Response to Comment Meet-140
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-141
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-142
The commenter expresses general concerns regarding the adequacy of the DEIR but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-143
Please see Response to Comment Ind 253-2.

Response to Comment Meet-144
The comment does not address the adequacy of the DEIR. Economic and quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-145
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-146
Please see Response to Comment Ind 432-1.

Response to Comment Meet-147
Please see Response to Comment Ind 432-3.

Response to Comment Meet-148
Please see Response to Comment Ind 432-4.

Response to Comment Meet-149
Please see Response to Comment Ind 432-6.

Response to Comment Meet-150
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-151
The comment provides background regarding the commenter's professional qualifications, and does not address the adequacy of the DEIR.

Response to Comment Meet-152
Please see Response to Comment Ind 522-1. In addition, Economic concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-153
The commenter expresses general concerns regarding the adequacy of the DEIR but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-154
Given that the proposed project would result in GHG emissions during construction that would exceed the applied threshold of 1,100 MT CO_2e per year, mitigation has been applied to reduce emissions to a less-than-significant level. As demonstrated in the DEIR, estimated operational GHG emissions would be below the applied numeric threshold of 10,000 MT CO_2e per year during any of the years of activity and, therefore, were deemed less than significant. CEQA does not require mitigation for impacts that are less than significant. Please see Master Response 27 - Greenhouse Gas Thresholds and Master Response 28 - Greenhouse Gas Credits.

Response to Comment Meet-155
The comment does not address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Meet-156
Please see Response to Comment Ind 523-1.

Response to Comment Meet-157
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-158
Please see Responses to Comments Agcy 10-1 and Agcy 10-13.

Response to Comment Meet-159
The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues. In addition, please refer to Chapter 4.8, Hydrology and Water Quality, and Chapter 4.11, Public Services and Utilities, of the DEIR related to water consumption and discharge.

Response to Comment Meet-160
The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues. In addition, please refer to Chapter 4.8, Hydrology and Water Quality, and Chapter 4.11, Public Services and Utilities, of the DEIR related to water consumption and discharge.

Response to Comment Meet-161
The commenter expresses general concerns regarding the adequacy of the DEIR but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please refer to Chapter 4.8, Hydrology and Water Quality, and Chapter 4.11, Public Services and Utilities, of the DEIR related to water consumption and discharge.

Response to Comment Meet-162
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-163
Please see Responses to Comments Ind 257-2 through Ind 257-4.

Response to Comment Meet-164
Please see Responses to Comments Ind 257-5 and Ind 257-6.

Response to Comment Meet-165
Please see Response to Comment Ind 257-9.

Response to Comment Meet-166
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-167
Please see Responses to Comments Ind 388-2, Ind 388-4, and Ind 388-5.

Response to Comment Meet-168
Please see Response to Comment Ind 388-6.

Response to Comment Meet-169
Please see Responses to Comments Ind 388-2, Ind 388-4 through Ind 388-6, and Ind 388-10.

Response to Comment Meet-170
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-171
Property values and economic concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-172
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-173
Please see Responses to Comments Agcy 10-9 and Agcy 10-10.

Response to Comment Meet-174
Please see Responses to Comments Agcy 10-6, Agcy 10-7, and Agcy 10-10.

Response to Comment Meet-175

Please see Responses to Comments Ind 679-10 through Ind 679-14.

Response to Comment Meet-176

The commenter expresses general concerns regarding collapsing tunnels, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Responses to Comments Ind 679-18 through Ind 679-20.

Response to Comment Meet-177

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-178

The commenter expresses general concerns regarding air quality and associated mitigation measures, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 - Non-EIR/Administrative Issues. Regarding air quality concerns, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, as well as Master Response 18 – Air Quality Thresholds, Master Response 24 - Project Construction Schedule, and Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Meet-179

Please see Master Response 2 – Social and Economic Impacts and Master Response 3 - Operator Responsibility.

Response to Comment Meet-180

Noise from activities has been analyzed in Chapter 4.10 of the DEIR and was determined to be less than significant after mitigation. Please see Chapter 4.10 of the DEIR. Furthermore, while the DEIR determined, based on best available data, that the proposed operations would not result in noise levels that would exceed the County's thresholds, the DEIR conservatively concludes that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and the project's noise impacts could be significant. As a result, the DEIR includes Mitigation Measure 4.10-3, which requires implementation of a robust, ongoing noise monitoring program. The noise monitoring system shall consist of the installation of permanent noise monitors at three to five locations on the Brunswick Industrial Site, and one site at the Centennial Industrial Site, to be determined by a third-party noise consultant under contract with the County, in coordination with the applicant. The permanent monitors shall be provided with a continual power source, and shall include internet connectivity technology, to enable electronic retrieval of noise monitoring data at any time by the County's third-party noise consultant. The County's third-party noise consultant is required to retrieve and evaluate mine-related operational noise levels within 30 days of commencement of mining, quarterly thereafter for the first five years, and then once per year thereafter for the life of the project. If noise levels are found to exceed the County's standards, then operation of the mine shall cease, until additional engineering controls can be implemented as needed.

Please also see Master Response 2 – Social and Economic Impacts and Master Response 3 - Operator Responsibility.

Response to Comment Meet-181
Chapter 4 of this Final EIR contains a Mitigation Monitoring and Reporting Program for all the required mitigation measures. In addition, the project will undergo annual inspections as required by SMARA. Impacts related to air quality and GHG are addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, of the DEIR. Please see Master Response 3 - Operator Responsibility, Master Response 18 – Air Quality Thresholds, and Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Meet-182
The comment expresses general opinions regarding the proposed project, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Meet-183
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-184
Please see Responses to Comments Ind 658-3 and Ind 658-4.

Response to Comment Meet-185
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-186
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-187
Please see Responses to Comments Grp 25-10, Grp 25-12, and Grp 25-13.

Response to Comment Meet-188
Please see Response to Comment Grp 25-34.

Response to Comment Meet-189
Please see Response to Comment Grp 25-37.

Response to Comment Meet-190
Please see Responses to Comments Grp 25-45 and Grp 25-46.

Response to Comment Meet-191
The comment is conclusory and does not address the adequacy of the DEIR.

Response to Comment Meet-192
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-193
The comment does not specifically address the adequacy of the DEIR. The comment incorrectly asserts that the Centennial Site is designated as a “Superfund” site under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) by the USEPA. The Centennial Site has never been on the National Priorities List (A “Superfund site”). Please refer

to Chapter 4.7, Hazards and Hazardous Materials, of the DEIR for further information. In addition, please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Meet-194

Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-195

The comment expresses general concerns related to arsenic and water, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 - Non-EIR/Administrative Issues. Also see Response to Comment Meet-193 above regarding the project not being a Superfund site. Please refer to Chapter 4.7, Hazards and Hazardous Materials, of the DEIR for further information related to existing arsenic concentrations on the project site, as well as Chapter 4.3, Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy related to toxic air contaminants such as arsenic.

Response to Comment Meet-196

The commenter expresses general concerns regarding the adequacy of the DEIR, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-197

The comment does not address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 – Operator Responsibility.

Response to Comment Meet-198

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-199

The comment does not address the adequacy of the DEIR.

Response to Comment Meet-200

The commenter expresses general concerns regarding the hydrology report, but does not specifically address the adequacy of the DEIR or provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-201

The comment does not address the adequacy of the DEIR. Please refer to Chapter 4.12, Transportation, of the DEIR for additional information related to impacts associated with transit facilities.

Response to Comment Meet-202

The comment does not address the adequacy of the DEIR. Please refer to Chapter 4.7, Hazards and Hazardous Materials, of the DEIR for additional information related to impacts associated with the hauling of hazardous materials.

Response to Comment Meet-203
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-204
The comment does not address the adequacy of the DEIR. Impacts related to biological resources are evaluated in Chapter 4.4, Biological Resources, of the DEIR; impacts related to hydrology and water quality, including erosion, are addressed in Chapter 4.8 of the DEIR; and impacts related to erosion are also addressed in Chapter 4.6 of the DEIR.

Response to Comment Meet-205
The comment does not address the adequacy of the DEIR. Air quality, including toxic air contaminants and asbestos, is addressed within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Response to Comment Meet-206
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-207
The commenter expresses general concerns regarding the adequacy of the DEIR, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-208
Please see Response to Comment Grp 2-4.

Response to Comment Meet-209
The comment is conclusory and does not address the adequacy of the DEIR.

Response to Comment Meet-210
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-211
Please see Response to Comment Grp 2-4 and Master Response 30 - Biological Study Technical Adequacy.

Response to Comment Meet-212
Please see Response to Comment Grp 2-5.

Response to Comment Meet-213
Please see Response to Comment Grp 2-7.

Response to Comment Meet-214
Please see Response to Comment Grp 2-4 through Grp 2-7, Grp 2-9, Grp 7-31, and Grp 13-2, as well as Master Response 30 - Biological Study Technical Adequacy, Master Response 37 – Birds and Raptors, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.
Grp 13-2

Response to Comment Meet-215
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

Regarding air quality, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding noise and vibration, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding traffic, please refer to Chapter 4.12, Transportation, of the DEIR.

Response to Comment Meet-216
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-217
Please see Responses to Comments Grp 16-2 and Grp 16-5.

Response to Comment Meet-218
Please see Responses to Comments Grp 16-4, Grp 16-9, and Grp 16-11.

Response to Comment Meet-219
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-220
The commenter expresses general concerns regarding the methodology used to assess air quality and water quality impacts, but does not provide specific examples or details. Thus, a detailed response is neither possible nor required. Please see Master Response 1.

Response to Comment Meet-221
The comment does not address the adequacy of the DEIR. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Meet-222
Please see Responses to Comments Ind 562-1 and Ind 562-3.

Response to Comment Meet-223
Please see Responses to Comments Ind 562-1 and Ind 564-2.

Response to Comment Meet-224
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-225
The commenter expresses general concerns regarding the adequacy of the DEIR but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-226
Please see Response to Comment Ind 577-6.

Response to Comment Meet-227
Please see Responses to Comments Ind 577-10 and Ind 577-11.

Response to Comment Meet-228
Please see Responses to Comments Ind 577-15, Ind 577-16, and Ind 577-17.

Response to Comment Meet-229
Please see Response to Comment Ind 577-15.

Response to Comment Meet-230
The commenter does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

The proposed project has yet to be presented to the Nevada County Board of Supervisors for decision; thus, no component of the proposed project has been adopted by the Board. Chapter 4 of this Final EIR contains the Mitigation Monitoring and Reporting Program that will need to be adopted by the Nevada County Board of Supervisors, if the proposed project is approved.

With respect to concerns regarding effects on nearby wells and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Response to Comment Meet-231
The commenter expresses general concern related to downstream waterways and cultural resources, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-232
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-233
Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Meet-234
Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA. The commenter is also referred to the Project Description chapter of the DEIR, which includes a description of the proposed Reclamation Plan. As presented therein, future use of the site would not include residential uses, nor is the site designated or zoned for residential use.

The commenter expresses general concerns regarding polluted water, air, and soil runoff, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-235
Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Meet-236

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA. The commenter is also referred to the Project Description chapter of the DEIR; specifically, as on page 2-3 of the DEIR, a Reclamation Plan and Financial Assurance Cost Estimate (FACE) will be required for the . The Reclamation Plan is provided in Appendix C of the DEIR.

Response to Comment Meet-237

Please see Response to Comment Meet-236 above. Please also see Master Response 3 – Operator Responsibility.

Response to Comment Meet-238

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-239

The comment does not address the adequacy of the DEIR. Please see Master Response 3 - Operator Responsibility.

Response to Comment Meet-240

A detailed analysis of impacts associated with explosives is included in Chapter 4.7, Hazards and Hazardous Materials. Specifically, Impact 4.7-1 addresses whether the proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. As discussed therein, for transportation purposes, explosives are classified by the Department of Transportation (DOT) in accordance with 49 CFR and under these regulations all explosives are listed as Hazard Class 1 materials. Explosives would be transported directly to the site by licensed explosive suppliers that possess the requisite permits, including a California Highway Patrol (CHP) hazardous materials transportation license and DOT hazardous materials permits. Numerous regulations are in place to ensure safety in the transport of explosives and a summary of these are provided in Table 4.7-2 of the DEIR. All companies and individuals transporting explosives to the site would be required to comply with all regulations provided in Table 4.7-2.

In addition, issues related to increased hazards to vehicle safety are addressed in Chapter 4.12, Transportation, of the DEIR. Please also see Master Response 10 - Explosives, Reagents, and Brunswick fill.

Response to Comment Meet-241

The commenter expresses general concern related to the use of chemicals, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

The commenter is referred to Chapter 4.7, Hazards and Hazardous Materials, of the DEIR and Master Response 8 – Mine Waste Characterization.

Response to Comment Meet-242

The commenter expresses general concern related to the adequacy of the DEIR, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-243

The commenter expresses general concern related to the mitigation measures of the DEIR, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Chapter 4 of this Final EIR contains a Mitigation Monitoring and Reporting Plan for all the required mitigation measures. In addition, the project will undergo annual inspections as required by SMARA. Please also see Master Response 3 - Operator Responsibility.

Response to Comment Meet-244

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-245

Please see Responses to Comments Ind 423-1 through Ind 423-4 and Meet-243 above. With respect to compliance with water quality standards, please see Chapter 4.8 of the DEIR, as well as Response to Comment Agcy 8-6 related to monitoring. Please also see Master Response 3 - Operator Responsibility.

Response to Comment Meet-246

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-247

Please see Response to Comment Ind 262-5

Response to Comment Meet-248

Please see Response to Comment Ind 262-8.

Response to Comment Meet-249

Please see Responses to Comments Ind 262-15 and Ind 262-16.