

From the Desk of:
Mr. Dale K. Brown, Professional Geoscientist
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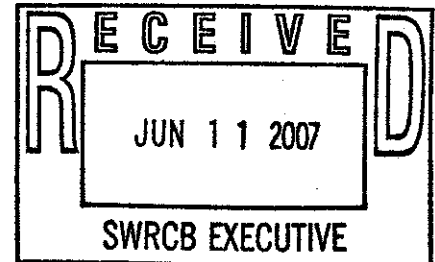
6/12/07 Workshop
Suction Dredge Mining
Deadline: 6/22/07 Noon

06-11-07

Mr. Song Her, Clerk to Board, Executive Office
State of California - Water Resources Control Board
P.O. Box 100
Sacramento, California 95812-0100

Fax: 916-341-5620

Email: commentletters@waterboards.ca.gov



Dear Sir,

I have been involved in placer mining since the early 1980's. I am aware of the *alleged* physical and environmental impacts of the suction dredging processes. I do not wish to see any state attempt to abolish or remove an individual's mining rights under the State of California or federal mining laws as established ~150 years ago. These rights are constantly challenged by extremists, individuals, groups, state agencies, etc. Don't misunderstand me, I think that questioning almost all of the established state and federal laws is a good thing and is an inherent part of the foundation for the United States Constitution. Changing these laws on an as needed and warranted basis is generally for the better. However, I have not seen a good argument for totally halting mining anywhere, and I do not believe frivolous comments and hasty actions by extremists & groups should change laws. The basis for these established laws were scrutinized enough by the general public when they were formatted, passed, and implemented 150 years ago.

Yes, I have read many papers supporting how increasing a stream's sediment loading characteristics causes problems with fish spawning efforts; however, for every paper criticizing the subject, I can find another that states that *there is no discernible impact*. As a long time, recreational suction dredger, I can visualize *no long term impact of stream sedimentation from the suction dredging processes from suction dredges smaller than a 12-inch nozzle size*. (A nozzle less than 12-inches includes both recreational dredges and light, portable commercial dredges.)

I cannot see any discernible difference between stream sediment loading from suction dredging and the natural sediment loading that takes place during a natural, normal +/- 1/2-inch rainfall event. In fact, I have never seen a suction dredge "cloud out" more stream channel than from the sediment loading from even a mild rainfall event. I do see that a natural, major storm/flood event has a far greater impact from stream sediment loading and toward a stream's flora & fauna. Oh...but....wait a minute.....that is just a normal process of erosion & deposition (part of the earth's life cycle) that has been taking place for the last 4-billion years, and....yet, the fish are plentiful and abundant for the last 500-million years. Looks like some extremist needs a head check! I just can't see a little bit of sediment in the water killing all of the fish. Unlike California, most of the lakes and streams in Texas are totally loaded with sediment; but, we still can't seem to get rid of the fish.

Note: A natural, major storm/flood event reworks/re-deposits all of the short term changes to a waterway's erosional & depositional environment(s) caused by just about any industry (including suction dredging and/or placer mining) within the flood boundaries of that waterway.

I do believe there could always be some changes made and some mild restrictions imposed in certain areas; however, I cannot see abolishing suction dredging. Suction dredges simply relocate the same riverbed materials already existing within the river or waterway.

I would also like to see better permitting, reporting, institutional controls and measures for larger commercial suction mining operations with suction nozzles greater than 12-inches or for that matter any type industrial site (petroleum refinery, steel smelter, etc.) near a waterway(s). You can rest assured that someone (an extremist faction) in the State of California has a proposed bill in the California legislature to get rid of all of the petroleum refineries, gas stations, steel factories, shipyards, etc. Simply making it illegal to refine or buy gasoline is not reasonable. What is warranted is a series of better institutional control measures protective of the environment and not the abolishment of an industry.

Additionally, I would like to see better use of the permitting monies collected by the State of California for suction dredging. I pay more money for my annual dredging permit from the Department of Fish & Game in California (\$170) than I do for my combination hunting license (\$80) in the State of Texas. In the State of Texas there is a supplemental hunting program called a Type 2 permit for an additional \$50 annual fee. The proceeds from these permits are utilized by the State of Texas to annually lease some 100,000+ acres of land for public hunting. The Texas Parks and Wildlife has full control of these areas and even sponsors public, handicapped and youth education programs and events on these lands. Maybe the State of California could follow this model for a suction dredging program. Just think, maybe..... Just like every industry there is always room for some changes.

I appreciate the opportunity to comment on the suction dredging. As always there are more issues to the suction dredging processes; however, I will save my comments for these other subjects for another day. Again....**Please, do not attempt to abolish or remove an individual's mining rights under the State of California or the federal mining laws.**

Sincerely,

New 49er's Associate Member



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