

From: <will_morrison@shastachess.net>
To: <sher@waterboards.ca.gov>
Date: 6/30/2007 9:09:25 PM
Subject: Comment Letter--Suction Dredge Mining

It came to my attention that the comment which we sent to you as an attachment may have been corrupted. I have included a copy of it as inline text in case this occurred. While I realize you may not be able to give it full consideration as a result of the June 22nd deadline, I would greatly respect your response to the request in the last paragraph (regarding recent suction dredge studies). Thank you for your time, sincerely,

Dan Morrison -- Miners Alliance

Original Message sent June 22nd:

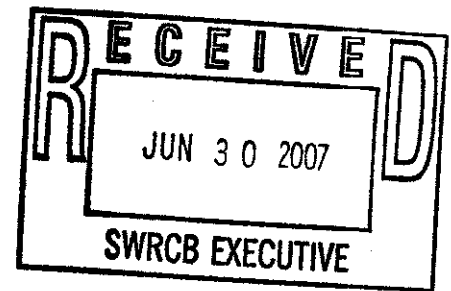
Miners Alliance
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The Miners Alliance is an unofficial organization dedicated to the protection and education of small miners. As a concerned party, we would like to raise several general points that should be central to any consideration of suction dredges' impact.

Firstly—and this should come as no surprise to anyone who has traveled one of California's alluvial streams over the past decade—there are not very many of us. On average, fewer than one thousand suction dredge permits are being issued per year, and of those, the vast majority are for recreational miners who operate dredges with engines roughly the size of a home lawn-mower.

Many people first introduced to suction dredging cannot divorce themselves from the image of the dredge; no matter how many positive impact studies they review, they cannot shake the feeling that there just must be something wrong with suction dredging because it looks so bad.

Turbidity exemplifies this gap between common sense and ecological reality. Dredge turbidity is brief and localized, usually unnoticeable several hundred feet downstream of the operation. It has little or no negative impact on organisms within it—compare this localized phenomenon with programs like the Trinity River Restoration Project, which has already artificially maintained turbid conditions through high dam discharges well into the early summer of 2006 and 2007 in an effort to restore declining fish populations. This is like the water several yards behind the sluice-box of a 8" dredge for the entire length of the river; the order of magnitude of such a project compared with the insignificant output of a suction dredge—coupled with the project's lack of significant impact, should dispel any myths concerning the negative influence of turbidity created by dredges. The engine atop a suction dredge does deposit some pollution in the river, but consider that nearly every major gold river in California has a paved road running along most of its length. Oftentimes merely a few yards from the water itself, the road collects oil, rubber, and



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Suction Dredge
Deadline: 6/22/07 Noon

other pollution on a scale incomparable to that of a dredge, and flushes them all into the river with each new rain.

Studies from the suction dredge boom of the 1980's and early 1990's all have several conclusions in common: The impact of suction dredges is extremely local and non-cumulative—tailings are washed away and holes filled during the flood season in almost all cases; invertebrate benthic life displaced or killed as a result of the activity is rapidly replenished. Damage to anadranous life through entrapment is negligible so long as proper seasonal restraints are observed; dredging does not scare or annoy proximate fish, and dredge tailings do not create a dangerous false spawning habitat for salmon and steelhead.

In fact, suction dredging has a significant potential benefit for California's dammed streams, where the lack of natural high-water flows causes sedimentation that prevents salmon and steelhead from spawning in the hardened substrate. Dredge activity breaks up these hardened deposits and helps to maintain the limited spawning ground in dammed streams.

Miners Alliance is unaware of any studies demonstrating long-term significant impact from suction dredging. If any such studies are known to the Water Resources Control Board, we respectfully request to be notified of them and/or sent copies for review and response.

Sincerely,

Dan Morrison—Miners Alliance