

From: Danielsan <DanielPool@webtv.net>
To: <commentletters@waterboards.ca.gov>
Date: Fri, Jun 8, 2007 7:03 PM
Subject: Comment Letter- Suction Dredge Mining

6/12/07 Workshop
Suction Dredge Mining
Deadline: 6/22/07 Noon

Dear Sirs and/or Ladies:

Thank you for taking the time to read my comment letter. My name is Daniel B. Pool and I have been suction dredge mining since 1981, using dredges sized from 2" to 6", following California Dept. of Fish and Game (CDFG) regulations. During that time I have conducted and observed many small-scale dredge mining operations and have never seen anything other than minimal impact to fish from underwater mining, especially when compared to what mother nature can dish out at flood stage. Many professional published studies support my observations, such as this study done on the Yuba River:

(It has been suggested that a single operating suction dredge may not pose a problem but the operation of multiple dredges would produce a cumulative effect that could cause harm to aquatic organisms. However, "No additive effects were detected on the Yuba River from 40 active dredges on a 6.8 mile (11 km) stretch. The area most impacted was from the dredge to about 98 feet (30 meters) downstream, for most turbidity and settleable solids (Harvey, B.C., K. McCleneghan, J.D. Linn, and C.L. Langley, 1982). Many such studies have been done over the last few decades, with similar findings, showing that suction dredge mining causes no harm even if minor gasoline or oil spills occur, as CDFG found here:

"Suction dredges, powered by internal combustion engines of various sizes, operate while floating on the surface of streams and rivers. As such, oil and gas may leak or spill onto the water's surface. There have not been any observed or reported cases of harm to plant or wildlife as a result of oil or gas spills associated with suction dredging" (CDFG, 1997). These are just two examples of published studies out of many I have read. I'm sure you must know that there is a group professing to be "environmentalists" who want certain laws passed for their personal agendas, while having no real concern for the environment, and having no real science to back up their "studies". If fish are the issue here, then consider these two common sense topics:

1. Let's work with dam operators on the rivers to install fish ladders. In my opinion, these should have been put in originally (back when labor was cheap.)
2. Establish the number of fish during spawning season that would be allowed to travel upstream, sufficient to provide the eggs and young fish for future harvests. Only AFTER these fish have passed may fishing season begin, this goes for EVERYONE, including tribal fishing, which is largely unregulated. This would truly be sustainable farming.

In closing, I would like to say that I believe CDFG is currently doing a good job, based upon the currently available science, of regulating suction dredge mining, and no changes should be made to the current regulations.

Sincerely,
Daniel B. Pool
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