



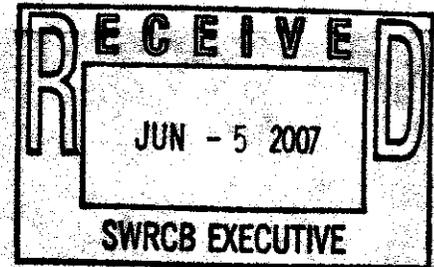
6/12/07 Workshop  
Suction Dredge Mining  
Deadline: 6/22/07 Noon

## Greenville Rancheria

P.O. Box 279 / 410 Main Street • Greenville, CA 95947 • 530.284.6135 • Fax 530.284.7594

May 30, 2007

Song Her, Clerk to the Board  
Executive Office, State Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100



**Re: Comment Letter- Suction Dredge Mining**

Ms. Her,

The Greenville Rancheria would like to submit our comments and concerns regarding suction dredge mining in California's waters. It is the Tribe's position that extreme care be taken to preserve all watersheds, all Riparian Habitat Conservation Areas; and in general, the prohibition of any project activities which would diminish water quality. We feel that there are many associated concerns with the procedures used in section dredge mining that could result in adverse effects of water quality.

Increased levels of turbidity, reduction of macroinvertebrate abundance and diversity, changes in stream morphology and alterations to the chemical qualities of river water are parameters that could be affected by mining activities. Our main concern is the disturbance and distribution of mercury in sediment around historic mining areas. The disturbance of mercury in the sediment could lead to methylation, resulting in methylmercury transport downstream. This poses a huge threat for bioaccumulation and biomagnifications in the food chain. Although the concentrations of mercury and methylmercury in water may be low and deemed safe for human consumption as drinking water, methylmercury concentration levels in macroinvertebrates, invertebrates, fish, predatory birds, migratory waterfowl, mammals, and humans will reach harmful levels over time.

The Greenville Rancheria would like to see new rules and regulations be made for suction dredge mining permits. The lack of enforcement of mining regulations from the Army Corps of Engineers has contributed to the degradation of California's waters. It is essential that the permit holders be held accountable to ensure that all discharges from mining operations comply with all applicable water quality standards and requirements outlined in the Clean Water Act. A plan of operation should be required for each

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proposed mining site before issuance of permits. We hope that the many issues associated with water quality and suction dredge mining will promote more scientific studies to further research and data in this area.

Thank You,

*Erica Kellison*

Erica Kellison  
Greenville Rancheria Tribal Chairperson