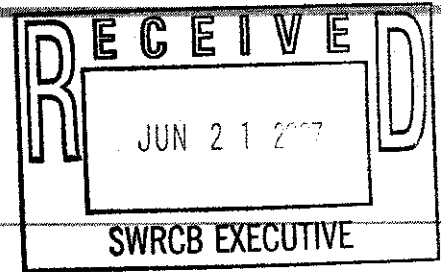


commentletters - "Comment Letter - Suction Dredge Mining"

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**To:** <commentletters@waterboards.ca.gov>  
**Date:** 6/21/2007 10:24:46 PM  
**Subject:** "Comment Letter - Suction Dredge Mining"



State Water Resources Control Board  
Division of Water Quality  
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21 June 2007

Dear Sirs,

The proposed changes to the state wide water quality exemption for suction dredgers is is very alarming since the facts from many studies conducted by the state of California, the state of Alaska and other independant researchers shows no basis for these actions.

A report on the water quality cumulative effects of placer mining on the Chugach National Forest, Alaska found that, "The results from water quality sampling do not indicate any strong cumulative effects from multiple placer mining operations within the sampled drainages." "Several suction dredges probably operated simultaneously on the same drainage, but did not affect water quality as evidenced by above and below water sample results. In the recreational mining area of Resurrection Creek, five and six dredges would be operating and not produce any water quality changes (Huber and Blanchet, 1992).

**This report describes the results of our research during 1997 and 1998 into the effects of commercial suction dredging on the water quality, habitat, and biota of the Fortymile River. The focus of our work on the Fortymile in 1997 was on an 8-inch suction dredge (Site 1), located on the mainstem At Site 1, dredge operation had no discernable effect on alkalinity, hardness, or specific conductance of water in the Fortymile. Of the factors we measured, the primary effects of suction dredging on water chemistry of the Fortymile River were increased turbidity, total filterable solids, and copper and zinc concentrations downstream of the dredge. These variables returned to upstream levels within 80-160 m downstream of the dredge. The results from this sampling revealed a relatively intense, but localized, decline in water clarity during the time the dredge was operating" (Prussian, A.M., T.V. Royer and G.W. Minshall, 1999).**

**"The data collected for this study help establish regional background geochemical values for the waters in the Fortymile River system. As seen in the chemical and turbidity data *any variations in water quality due to the suction***

**dredging activity fall within the natural variations in water quality" (Prussian, A.M., T.V. Royer and G.W. Minshall, 1999).**

**Please do not allow an important part of California history to be taken away by special interest groups with no facts to back up their accusations. there are even facts to show dredging is helpful to the fish,**

Suction dredging could alter pool dimensions through excavation, deposition of tailings, or by triggering adjustments in channel morphology. Excavating pools could substantially increase their depth and increase cool groundwater inflow. This could reduce pool temperature. If pools were excavated to a depth greater than three feet, salmonid pool habitat could be improved. In addition, ***if excavated pools reduce pool temperatures, they could provide important coldwater habitats for salmonids living in streams with elevated temperatures*** (SNF, 2001).

Thank You

Gary Wright

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