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

From: "Gene Dilger" <GDilger@CollectAmerica.com>
To: <commentletters@waterboards.ca.gov>
Date: Fri, Jun 8, 2007 8:52 AM
Subject: Comment Letter regarding suction dredging

Gentlemen:

Within any waterway, sediment is primarily carried in suspension during periods of rainfall and high flow. This is an important point, as it indicates that a dredging operation has less, or at least no greater effect on sediment mobilization and mobility than a rain storm."

All of these research studies have concluded that only a local significant effect occurs, with it decreasing rapidly downstream. The studies have been wide spread, having been undertaken in Alaska, Idaho, California, Montana and Oregon.

The science supports de minimus status for < 6-inch suction dredges. Turbidity is de minimus according to the U.S. Army Corps of Engineers.

"Effects from elevated levels of turbidity and suspended sediment normally associated with suction dredging as regulated in the past in California appear to be less than significant with regard to impacts to fish and other river resources because of the level of turbidity created and the short distance downstream of a suction dredge where turbidity levels return to normal" (CDFG, 1997).

For the recreational gold mine using a suction dredge of 6" or less there is no need add additional regulations to this activity, the environmental impact is minimum.

Gene Dilger