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To: <commentletters@waterboards.ca.gov>
Date: Sat, Jun 9, 2007 10:22 AM
Subject: Comment Letter - Suction Dredge Mining"

State Water Resources Control Board
Division of Water Quality
P.O. Box 100 Sacramento, California 95812-0100
Fax: 916-341-5620 email: commentletters@waterboards.ca.gov

8 June 2007

Dear Sirs,

My name is Gilbert Blevins. I am a gold dredger residing in Florida. My wife and I joined the New 49'ers Prospecting Organization in northern California in 1998. We enjoyed Northern Ca. so much my wife bought a home and she moved there in 2000. I still own a business in Fl. and spend most of my time there. During the year I commute many times to Ca. to enjoy suction dredging. This results in the expense of a lot of dollars in fuel, lodging, food, and vehicle repairs. This money was mostly spent in and around Siskiyou County. I point this out only in an attempt to give you a perspective on the millions in dollars that suction dredgers spend every year on their sport.

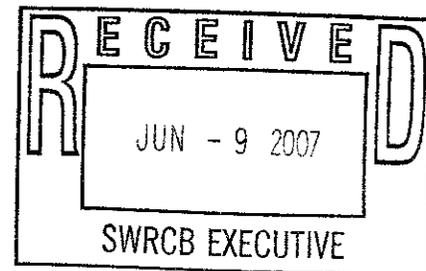
Since the main focus of this request for comments is about how suction dredging can affect water quality I ask you to dig deep down and use your common sense. First and the most important point is Suction dredging adds nothing to the water that was not already there. Second a normal rain fall completely clouds the water every time it happens. As I have been actively operating a suction dredge for over 10 years, I have had plenty of opportunity to observe the impact upon water quality. My personal observation has been when any visual impact can be seen at all, the impact is small and localized. This observation has been similarly reflected by numerous studies and published reports on this subject. For example, a report on the water quality cumulative effects of placer mining on the Chugach National Forest, Alaska found:

"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).

A report showing the small amount of turbidity visible from a suction dredge.

Thomas (1985), using a dredge with a 2.5-inch diameter nozzle on Gold Creek, Montana, found that suspended sediment levels returned to ambient levels 100 feet below the dredge. Gold Creek is a relatively undisturbed third order stream with flows of 14 cubic feet per second. A turbidity tail from a 5-inch (12.7 cm) dredge on Clear Creek, California was observable for only 200 feet downstream. Water velocity at the site was about 1 foot per second (Lewis, 1962).

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



Many reports have been commissioned at great expense from all levels of the government over the past 50 years to determine if suction dredging caused any damage to the environment. In every case little if any damage was found. How much money do you need to spend to prove a point that has already been made by the most powerful government organization many times over? I am enclosing several exerts from those studies.

From the Ca. Fish and Game.

Suction dredging causes less than significant effects to water quality. (CDFG, 1997).

"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).

The impact of turbidities on water quality caused by suction dredging can vary considerably depending on many factors. Factors which appear to influence the degree and impact of turbidity include the amount and type of fines (fine sediment) in the substrate, the size and number of suction dredges relative to stream flow and reach of stream, and background turbidities (CDFG, 1997).

"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).

A final report from an EPA contract for analysis of the effects on mining in the Fortymile River, Alaska stated,

"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).

Gold prospecting has been a productive activity in California since before we were even a State. With this in mind, I encourage you to please use common sense when you make a decision concerning a renewal of your state-wide exemption for suction dredgers. While I understand that economic consequences are not your first concern, good leadership and responsibility to Californians require State agencies to take an honest look at the costs

and benefits of the various policies which are being considered.

In this case, if you choose to not renew the state-wide water quality exemption for suction dredgers, I can nearly guarantee that you will eliminate an entire industry in this State; an industry which does a great deal to help support many rural communities; an industry that generates millions upon millions of dollars in income for California -- and would continue to do so for the foreseeable future. We hope you will carefully consider what will be gained before you destroy our industry!

Thank you very much for considering my comments.

Sincerely,

Gilbert Blevins