

From: <THEPIMLEYS@aol.com>
To: <commentletters@waterboards.ca.gov>
Date: Thu, May 24, 2007 2:10 PM
Subject: "Comment Letter – Suction Dredge Mining."

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

Hello

My name is Kent Pimley
I'm writing you today to ask you to take a good look at all the " facts "
and not just opinions on the dredging issue,

I do a lot of
fishing and hunting up in the hills and like most folks I care a lot about our
environment, and I'm also a gold miner and do greatly in joy dredging in the
summer for gold, and I can honestly say that if we all follow the rules that
are already in place at this time for dredging, any problems that incur are
very short term and minimal. and in fact it has been proven that dredging does
far more good in the long term !!!

Below I have listed just a couple of the reports on this matter and I
think you will see that there is a very minimal impact on the environment from
dredging....

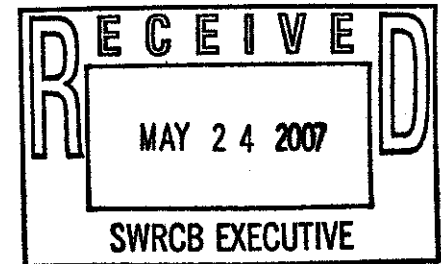
I DO OPPOSE AB1032 AND ASK YOU TO ALSO !!!!

Thank you for your time..

A U.S. Army Corps of Engineers study on suction dredge mining found de
minimus impact on aquatic resources and provided "official recognition" of what
suction dredgers have long claimed: that below a certain size [4 inches], the
effects of suction dredging are so small and so short-term as to not warrant
the regulations being imposed in many cases."

The results from Resurrection Creek indicated that there was no difference
in the macro invertebrate community between the mining area and the locations
downstream of the mining area in terms of macro invertebrate density and taxa
richness. The sampling was done 35 days after mining had been completed for
the season and shows a rapid recovery of the mined areas." (The U.S.
Environmental Protection Agency – 2001.)

Fish and invertebrates displayed considerable adaptability to dredging,
probably because the streams naturally have substantial seasonal and annual
fluctuations (Moyle et al. 1982). These fluctuations, in the form of flushing
winter flows, can greatly reduce the long term impact of dredging. Even during
the relatively mild winter of 1980/81, high flows still filled the hole created
by dredging on NFAR with a sand and gravel mixture and eliminated all sand
from the main streambed. After the high flows in winter and spring of 1981/82,
no substrate changes caused by dredging in the previous summer were evident on
Butte Creek. Saunders and Smith (1965) observed a quick recovery in the
trout population after scouring of a heavily silted stream, which, along with the
quick



Currently, all suction dredge mining in the State of California requires a permit and compliance with established rules and regulations. The California Department of Fish and Game already has the authority to close waters to suction dredge mining that have been designated "Heritage Trout Waters," to protect species listed under the California Endangered Species Act, or to respond if there has been a water level change and closure is necessary to protect fish and wildlife.

Proceeding with the full CEQA analysis as ordered by the court would ensure that the Department provides notice and due process, and bases any decision for closure on science rather than perception, with benefit of a full public hearing process.

It would appear that AB 1032 (Wolk) would allow broad unqualified authority for declaration of closures to protect aquatic species, amphibians and "species of concern" without any apparent requirement for due process, public hearing or scientific justification of need. This increases the potential for arbitrary and capricious action by an agency. In addition, as mining on federal lands

***** See what's free at <http://www.aol.com>.