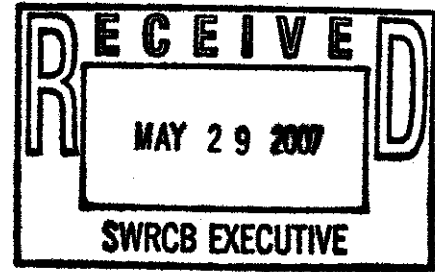




Resources Coalition

www.resourcescoalition.org
www.minersrally.org

PO Box 2131
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Monday 28, 2007

To: State Water Resources Control Board

Division of Water Quality 1001 I Street • Sacramento, California 95814 • (916) 341-5455
1 Mailing Address: P.O. Box 100 • Sacramento, California • 95812-0100 FAX (916) 341-5463 • <http://www.waterboards.ca.gov>

NOTICE OF PUBLIC WORKSHOP ON SUCTION DREDGE MINING

Linda S. Adams

Secretary for

Environmental Protection

Resources Coalition is a 5000 members strong organization with membership extending into California. For over 8 years this organization has dealt with small-scale mining issues and has a fairly substantial knowledge in regards to dredge mining.

I would like to break my comments into several areas to give clarity to the position that we as an organization have.

First area: Intent of Clean Water Act

Clean Water Act was written to control large pollution entering our water systems whether it is from a municipal sewage treatment plant to industrial waste discharge. Second the act originally was designed and still is for an additive process, something coming out of a pipe. Pollution is additive in nature this act was designated in the Clean Water Act specifically applies to facilities, small-scale dredging is not a facility.

Significant And Non-Significant:

The Clean Water Act is designed to deal with significant additive processes to help preserve the quality and water standards. Significant in terms of federal studies represents a threshold in which it must be regulated. All major excepted studies, peer-reviewed label small-scale dredging as less then significant, this means it falls below threshold for regulation. When one looks at impact within qualified studies the general recognition that long-term impact is none. Thus as an agency that might take on this issue as important will have a hard time justifying cost against return and being in line with federal established guidelines. Federal Government is looking at states use of

federal money based upon lack of results for money spent this will become a bigger issue in coming years and could affect the State of California significantly. Good study done for the EPA is the following:

**US Environmental Protection Agency
Region 10, Seattle, Washington**

Prepared By: Aaron M. Prussian, Todd V. Royer, and G. Wayne Minshall

**Department of Biological Sciences
Idaho State University
Pocatello, Idaho**

FINAL REPORT, June 1999

Impact of suction dredging on water quality, benthic habitat, and biota in the Fortymile River, Resurrection Creek, and Chatanika River, Alaska

Our Take on Small-Scale Suction Dredging Its Effect:

Small-scale dredging can be classed as less than significant for numerous reasons that I shall briefly lists some.

We only move material a pre-existing in the river bottom, there is no additive process.

Operationally is seasonal nature and is never a constant source point, meaning dredges are often moved and are never used consistently and continuous.

Small-scale dredges move relatively small amounts of pre-deposited material in streambeds. Typical amounts represent less then 1 yard in a 4-hour period in best of conditions based on standard 4-inch dredge.

There is no science that he establishes that dredge plumes raise water temperatures because of absorbing sun's energy. Dredge plumes on small-scale equipment are narrow and dissipate quickly in most cases.

A good study done by the Departmental of Ecology, State of Washington established the dredge plumes were in fact no danger to aquatic life. This study can be found at the following site:

<http://www.ecy.wa.gov/pubs/0503007.pdf>

"Effects of Small-Scale Gold Dredging on Arsenic, Copper, Lead, and Zinc Concentrations in the Similkameen River"

Washington State Department of Ecology, March, 2005

Another concept that any process looking at small-scale dredging equipment should take into account in regards to environmental impact is mitigation. Here small-scale dredging has many aspects that are not reported and must be considered in the overall consideration.

For every action one can see negative and positive results and both elements must be given weight in determination especially in regard to a federally regulated activity. Example of this would be turbidity; yes we move pre despotized material back into the active water column this would be a negative yet at the same time we clean gravels and help re-oxygenize sub stream structure this would be a benefit. Taking this example one step further this process allows substructure cooler water back into the streams bed, which for fish can remove stress by giving more oxygen rich water to rest in. So a net benefit equalizes any downstream effects of any turbidity moved further down the river course.

Additionally small-scale dredging and the small-scale mining community is the only active community dealing with non-point pollution! In the State of Washington over the last three years small-scale mining community has turned in to the Department of Ecology over 121 pounds of elementary mercury collected from Washington State waterways. This project sponsored by us Resources Coalition and the Department of Ecology has had a unique success in dealing with a significant problem at the EPA have no specific answers for. This again reflects on water quality in a significant way and as a result of our community's dedication to working in an environmentally friendly way.

Conclusion:

On your workshop dealing with small-scale dredging and water quality I would strongly recommend that you recognize the significant advantages of having this historic activity protected by the State of California. Small-scale mining water quality impact is less than significant is not a threat to aquatic life and would be a waste of valuable resources trying to monitor or control it in a significant way. Additionally small-scale mineral prospecting, dredging is protected by federal law and a significant reduction in individuals right of access to federal lands would result in a taking this would trigger lawsuits at the federal level. Resources Coalition is committed to education and protection of this very important part of American life do not tread on freedom lightly.

Appreciate your time and this opportunity to express our viewpoint in your process please feel free to contact me at any time.

Sincerely

Mark Erickson
President Resources Coalition
inlink@hotmail.com
info@resourcescoalition.org



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

11 West Edmund Avenue, Suite 200 • Olympia, Washington 98502-1422 • (360) 373-2400

March 30, 2007



Mr. Mark Erikson
Resources Coalition
P.O. Box 2131
Stamper, WA 98390

Dear Mark:

The Washington State Department of Ecology would like to thank you for getting word out to the clubs and members of the Washington Prospectors Mining Association (WPMA) about the mercury and lead collection event at WPMA's annual Gold, Gem, and Mineral Show in Meenros. It proved to be a great opportunity to collect mercury recovered during mining and prospecting activities. We accepted over 70 pounds of mercury from this event! That's over twice as much as we collected from miners in all of 2006. In addition, approximately 7 pounds of lead was turned in. The safe collection of this amount of liquid mercury not only protects your water quality and fish in the natural environment, it also greatly reduces the potential of exposure to you, your family and neighbors to highly toxic mercury vapors.

We are in the early stages of identifying which events we can attend in 2007. When we have set a schedule, we will notify you with the hopes that you could continue to pass the word to the groups during your travels. We are also interested in obtaining photographs showing lead and elemental mercury in the environment to use in the table-top presentation that is displayed during the events. Do you think you could ask the groups if they could send us photos? Please contact Holly Cashman at 360-575-2724 or email to hca461@ecy.wa.gov to discuss the possibility of collecting photos.

Again, we greatly appreciate your time and efforts to assist the safe removal and collection of mercury and lead from the environment. We are looking forward to another great year of working with you and the members of the WPMA!

Sincerely,

Brian Dick
Section Manager
Hazardous Waste and Toxics Reduction Program
Central Regional Office
Washington State Department of Ecology

HC/bd/tp