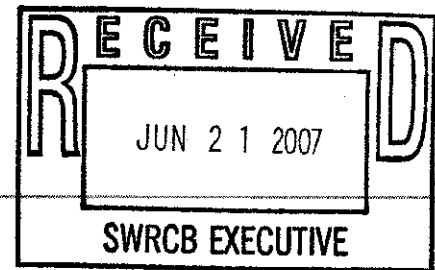


commentletters - Comment Letter - Suction Dredge Mining"

From: Tim Sullivan <minerodeloro@yahoo.com>
To: <commentletters@waterboards.ca.gov>
Date: 6/21/2007 9:51:25 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,

Water quality and the well being of aquatic life is a very important subject for us all, but the issue should not be allowed to be distorted with non-facts and used to promote the agenda of special interest groups. Dredging in California has been a very enjoyable and important activity in my life for over 15 years and I do not want this right taken away from myself and other dredgers when there is no scientific fact to back up the claims of the groups trying to put an end to dredging in California, to the contrary there have been numerous studies over the years done on the subject of the effects of dredging on the environment and none of the conclusions of the studies show any need to end dredging.

It has been suggested that a single operating suction dredge may not pose a problem but the operation of multiple dredges would produce a cumulative effect that could cause harm to aquatic organisms. However, "No additive effects were detected on the Yuba River from 40 active dredges on a 6.8 mile (11 km) stretch. The area most impacted was from the dredge to about 98 feet (30 meters) downstream, for most turbidity and settleable solids (Harvey, B.C., K. McCleneghan, J.D. Linn, and C.L. Langley, 1982). In another study, "Six small dredges (<6 inch dredge nozzle) on a 1.2 mile (2 km) stretch had no additive effect (Harvey, B.C., 1986). Water quality was typically temporally and spatially restricted to the time and immediate vicinity of the dredge (North, P.A., 1993).

As far as the effects of dredging introducing pollutants to the water the CDFG had this to say: "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).

Dredging has given me an even greater awareness and respect for aquatic life, prior to becoming a gold dredger I was an avid fisherman. Since that time I have given up fishing because I do not want to cause harm to fish and some studies show that the fish actually benefit from the dredging activity,

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).

These are just a few of the studies that can be cited as showing that dredging IS NOT significantly having a negative impact on water quality as long as dredging is conducted in accordance to the existing regulations.

Thank you for giving me the opportunity to voice my concerns.

Tim Sullivan
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