

# Idaho-Maryland Mine Project

SCH# 2020070378

## Final Environmental Impact Report

Volume V of IX  
(Chapter 2 *Continued*)

Prepared for  
County of Nevada



December 2022

Prepared by



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## **2. Responses to Comments** ***(CONTINUED)***

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**DRAFT EIR EMAIL COMMENTS –  
Proposed Idaho-Maryland Mine (DEIR).  
April 4, 2022**

**Matt Kelley**  
Senior Planner, Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902  
Phone: 530-265-1423  
Email: [Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

**GENERAL COMMENTS on the DEIR and the Proposal  
from Gary Zimmerman of Nevada City, CA:**

Thank you for the opportunity to **comment on the DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) for the proposed re-opening of the now closed Idaho-Maryland Mine and Toxic Superfund Waste Site.**

Ind 268-1

From my experience reviewing and commenting on a number of environmental impact reports, as well as the economic impacts of a number of proposed projects over the past four decades, I would like to provide comments on the DEIR and the associated proposed project.

✓ **I would like to begin with comments on several general aspects of this DEIR, which is clearly incomplete and inadequate, and likely will end up in court.**

*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*



**GENERAL OBSERVATIONS:**

Ind 268-2

- ✓ **CLIMATE CONCERNS: This one proposed project would consumer about 1/8<sup>th</sup> of the county's current energy consumption and generate ADDITIONAL GREENHOUSE GAS EMISSIONS that would offset existing County Efforts to REDUCE EMISSIONS. Straining Nevada County's power grid and spiking greenhouse gas emissions and worsening air quality ARE SIGNIFICANT ADVERSE IMPACTS!**

Ind 268-3

- ✓ **BLASTING UNDERGROUND & IMPACTS on TECH FIRMS ABOVE GROUND -- ECONOMIC LOSSES: My recollection was that this was an important adverse impact from the failed effort to reopen the Idaho-Maryland Mine in the 2005-2012 time frame. Is there a proposed estimate of the potential costs to existing "above ground" tech firms of product losses related to vibrations caused by proposed continuous underground blasting if the mine were to be reopened?**

Ind 268-4

- ✓ **If not, why not? If so, when will it be available to Grass Valley and Nevada County businesses, governments, and the public?**

Ind 268-5

- ✓ **CENTENNIAL SITE: This site is ALREADY A TOXIC "SUPERFUND" SITE, WAS IT SUPPOSED TO BE CLEANED UP FIRST by Rise Gold? Has Rise Gold developed a clean up plan? Implemented a clean up plan? Paid to begin the clean up? If not, why not?**

*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*



- Ind 268-6 ✓ **WILL THE PROPOSED MINE PAY FOR THE EXISTING CLEAN UP, OR WILL IT “FAIL” AND LEAVE OTHERS (GOVERNMENTS AND TAX PAYERS) TO PAY FOR THE CLEAN UP?**  
How can Nevada County protect itself from the RISK that FAILURE or EARLY CLOSURE results in “Others” paying for the proposed Rise Gold clean up(s)?
- Ind 268-7 ✓ **NOTE: RISE GOLD bought this property knowing that it included nearly 270,000 cubic yards of mine tailings that include a variety of toxics that should be cleaned up...**  
Has the applicant made a good faith effort to begin the toxic superfund site clean up on the Centennial parcel? What is the cost of the clean up of existing toxics on the site? The annual cost of clean up associated with proposed annual operations?
- Ind 268-8 ✓ **ASBESTOS: SERPENTINE ROCK, common in Nevada County and closed mines, often contain asbestos. Is the type(s) of asbestos found in the Idaho-Maryland mine tailings considered a toxic waste today? What is the typical asbestos content of the mine tailings that would be produced by the proposed reopening of the mine? What are the annual costs of cleaning up the existing mine tailings, and their asbestos content, and the costs of cleaning up additional “new” mine tailings that would be located on the proposed mine site?**
- Ind 268-9 ✓ **ECONOMIC BENEFITS: HAS THE PROPOSED ECONOMIC IMPACT STATEMENT BEEN PREPARED, BEEN AVAILABLE FOR PUBLIC COMMENT, INCLUDING FROM Financial Analysts, Accountants, and Economists? Has it been reviewed for accuracy by Nevada County officials?**

*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*





- Ind 268-10 ✓ **ECONOMIC IMPACTS: WHAT ARE THE ECONOMIC COSTS, in lost property values arising lost or contaminated wells, from close proximity to an active mine site, toxic waste tailings, noise, traffic, air and water quality?**
- Ind 268-11 ✓ **FALLING PRPERTY VALUES, both private homes and local businesses operating near or in the vicinity of the toxic sites, and properties losing property rights to their groundwater, also likely will impact Nevada County property tax assessments and property tax receipts. ,Overtime, or in event that the proposed mine fails or is closed before the 80-year timeframe is completed, these costs will be CUMULATIVE and could be SUBSTANTIAL!**
- Ind 268-12 ✓ **Have these costs to individuals, businesses, and governmental organizations like Nevada County, school districts, special districts, NID, been evaluated in the DEIR? Have the proposed project proponents offered to provide mitigation or compensation (and for how long?) to those who will suffer damage and lost property values and tax receipts as a result of reopening this mine, that will require mitigations and expensive treatment of toxics into perpetuity? IF not, why not, and when will this analysis be provided to Grass Valley neighbors and officials?**

*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*



Ind 268-13

✓ **MARKET RISK: PRICE of GOLD? Aside from the many other RISKS associated with the proposed mine reopening, is the price of gold.** The potential success or failure of this proposed project, from the standpoint of the firm, may depend on the price of gold on the global market. Please note that gold prices have a history of moving, both up & down, with a longer-term upwards trend. The downward movements, like during the 2008 Financial Crisis, create another RISK, that a fall in the price of gold also could cause a failure of the proposed mine operations. For example, note the substantial fall in gold prices from the 2012 peak through 2016. Sales of gold stocks by central banks in a financial emergency or crisis also could dramatically lower the market price of gold for other uses.

Ind 268-14

✓ **FAILURE or CLOSING (well before 80 years...)** **The price of gold is high now, but that does not guarantee that it will remain high forever.** How might higher and rising interest rates, anticipated in the years ahead, also make non-interest paying (but including costs of gold storage) gold less attractive to financial instruments like bonds or stocks that pay interest or dividends. Does the DEIR consider this RISK to the success of a proposed gold mine, when the cost of failure or closing, are likely to result in **significant adverse environmental and clean up costs to Nevada County and its taxpayers?**

*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*



Ind 268-15



**Chart 1: Historic Price of Gold Chart. 1992-to-2022**

*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*



Ind 268-16

**CONCLUSIONS:** Again, having reviewed many DEIRs for a number of organizations over many years, my professional opinion is that this DEIR is **INADEQUATE** and **INCOMPLETE!**

Ind 268-17

It underestimates or ignores **CUMULATIVE SIGNIFICANT ADVERSE IMPACTS & RISKS** in a number of areas, including **WATER, AIR, TRAFFIC, and QUALITY of LIFE CONCERNS!**

Ind 268-18

The DEIR makes **ASSUMPTIONS** that without complete information or study. It makes **ASSUMPTIONS** that **NECESSARY**, but **RISKY MITIGATIONS**, some that last forever, will be successful, when **FAILURES** involving **WATER AVAILABILITY and QUALITY, AIR QUALITY, GREENHOUSE GAS EMISSIONS, PROPERTY VALUES, TAX REVENUES, ENERGY USAGE, & EVEN AESTHETICS...**

Ind 268-19

The DEIR indicates that the **PROPOSED PROJECT** was **POORLY CONCEIVED** and **HIGHLY SPECULATIVE**, and **SHOULD NOT BE APPROVED!**

Thank you for the opportunity to comment on this important document.

Gary Zimmerman  
Economist  
11453 Snowline Road  
Nevada City, California 94595

*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*





## **INDIVIDUAL LETTER 268: GARY ZIMMERMAN**

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### **Response to Comment Ind 268-1**

This comment is introductory in nature and the commenter opposes the project. The commenter also states the DEIR is inadequate and identifies the Centennial Industrial Site as a “Toxic Superfund Waste Site.” The commenter’s opposition to the project is noted for the decisionmakers. Regarding the Centennial Industrial Site, the commenter is referred to Master Response 9 – Historical Mine Waste at Centennial Site. Responses to specific comments are provided below.

The commenter incorrectly asserts that the Centennial Site is a “Superfund” site. The Centennial Site has never been on the National Priorities List<sup>1</sup> (A “Superfund site”). The Centennial Site has never been proposed to be placed on the National Priorities List (NPL). The USEPA has prepared a Site Inspection Report in 2019 for the Centennial site but did not score the site using the Hazard Ranking System (HRS). The HRS is the primary method used to place sites on the NPL<sup>2</sup>.

### **Response to Comment Ind 268-2**

The commenter objects to the project’s energy consumption and states that the project will result in adverse air quality impacts (e.g., GHG emissions). The commenter does not identify how the DEIR is inadequate with regard to these impacts. The DEIR analyzed air quality impacts in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and found those impacts to be less than significant after mitigation. The commenter is also referred to Master Response 27 – Greenhouse Gas Thresholds and Master Response 25 – Nevada County Energy Action Plan.

### **Response to Comment Ind 268-3**

The commenter raises concerns regarding businesses that sell electronic equipment and any potential impacts related to underground blasting and vibrations. The vibration impacts to electronic equipment was analyzed for analog devices and underground blasting associated with the project would result in a less than significant vibration-related impact to analog devices. (DEIR, pp. 4.10-54, 4.10-55.) Regarding purely economic losses as a result of the project, the commenter is referred to Master Response 2 – Social and Economic Impacts.

### **Response to Comment Ind 268-4**

The commenter asks if a proposed estimate of business losses to electronics businesses near the project site. The commenter is referred to Response to Comment Ind 268-3.

### **Response to Comment Ind 268-5**

The commenter asks if the Project Applicant has developed a cleanup plan for the Centennial Industrial Site. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

### **Response to Comment Ind 268-6**

The commenter asks if the Project Applicant will pay for the cleanup of the Centennial Industrial Site. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

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<sup>1</sup> <https://www.epa.gov/superfund/superfund-national-priorities-list-npl>

<sup>2</sup> <https://www.epa.gov/superfund/about-superfund-cleanup-process#pasi>





### **Response to Comment Ind 268-7**

The commenter raises concerns with the Centennial Industrial Site. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA, and Master Response 9 – Historical Mine Waste at Centennial Site.

### **Response to Comment Ind 26-8**

The commenter asks whether asbestos is found within the Idaho-Maryland Mine tailings and whether new waste rock from the Idaho-Maryland Mine would contain asbestos. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA, and Master Response 9 – Historical Mine Waste at Centennial Site.

The DEIR discusses asbestos in detail in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and found the impacts to be less than significant after mitigation. The commenter is also referred to Master Response 22 – Conservatism of Asbestos Assumptions.

### **Response to Comment Ind 268-9**

The commenter is concerned about the economic benefits of the project. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

### **Response to Comment Ind 268-10**

The commenter is concerned about the project's potentially adverse economic impacts. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

### **Response to Comment Ind 268-11**

The commenter is concerned about the project's potentially adverse economic impacts. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

### **Response to Comment Ind 268-12**

The commenter is concerned about the project's potentially adverse economic impacts. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

### **Response to Comment Ind 268-13**

The commenter is concerned that the price of gold may fluctuate and impact the viability of the project. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

### **Response to Comment Ind 268-14**

The commenter is concerned that the price of gold may fluctuate and impact the viability of the project. The commenter is also concerned about reclamation when the Idaho-Maryland Mine closes. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Regarding reclamation, the project requires an approved Reclamation plan. To ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably



determines are adequate to perform reclamation in accordance with the mining operation's approved Plan. (DEIR, p. 4.6-24, Appendix C.)

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

**Response to Comment Ind 268-15**

The commenter provides an image of chart showing the historic price of gold from 1992 to 2022. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

**Response to Comment Ind 268-16**

The commenter states that the DEIR is inadequate but provides no specifics or evidence. Responses to specific comments are provided above. The commenter is also referred to Master Response 1 – Non-EIR/Administrative Issues

**Response to Comment Ind 268-17**

The commenter states that the DEIR is inadequate but provides no specifics or evidence. Responses to specific comments are provided above. In regards to quality of life concerns, the commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

**Response to Comment Ind 268-18**

The commenter states that the DEIR is inadequate but provides no specifics or evidence. Responses to specific comments are provided above. In regards to economic issues, the commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

**Response to Comment Ind 268-19**

The commenter states that the project is poorly conceived, speculative, and should not be approved. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.



**Individual Letter 269**

1

**DRAFT EIR EMAIL COMMENTS –**

**Proposed Idaho-Maryland Mine (DEIR).**

**April 4, 2022**



**CC: ORIGINAL  
BY EMAIL  
ON 4-4-2022  
(See Back Page)**

**Matt Kelley**  
Senior Planner, Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902  
Phone: 530-265-1423  
Email: [daho.MMEIR@co.nevada.ca.us](mailto:daho.MMEIR@co.nevada.ca.us)

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*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*

Ind 269-1



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*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*





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*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*



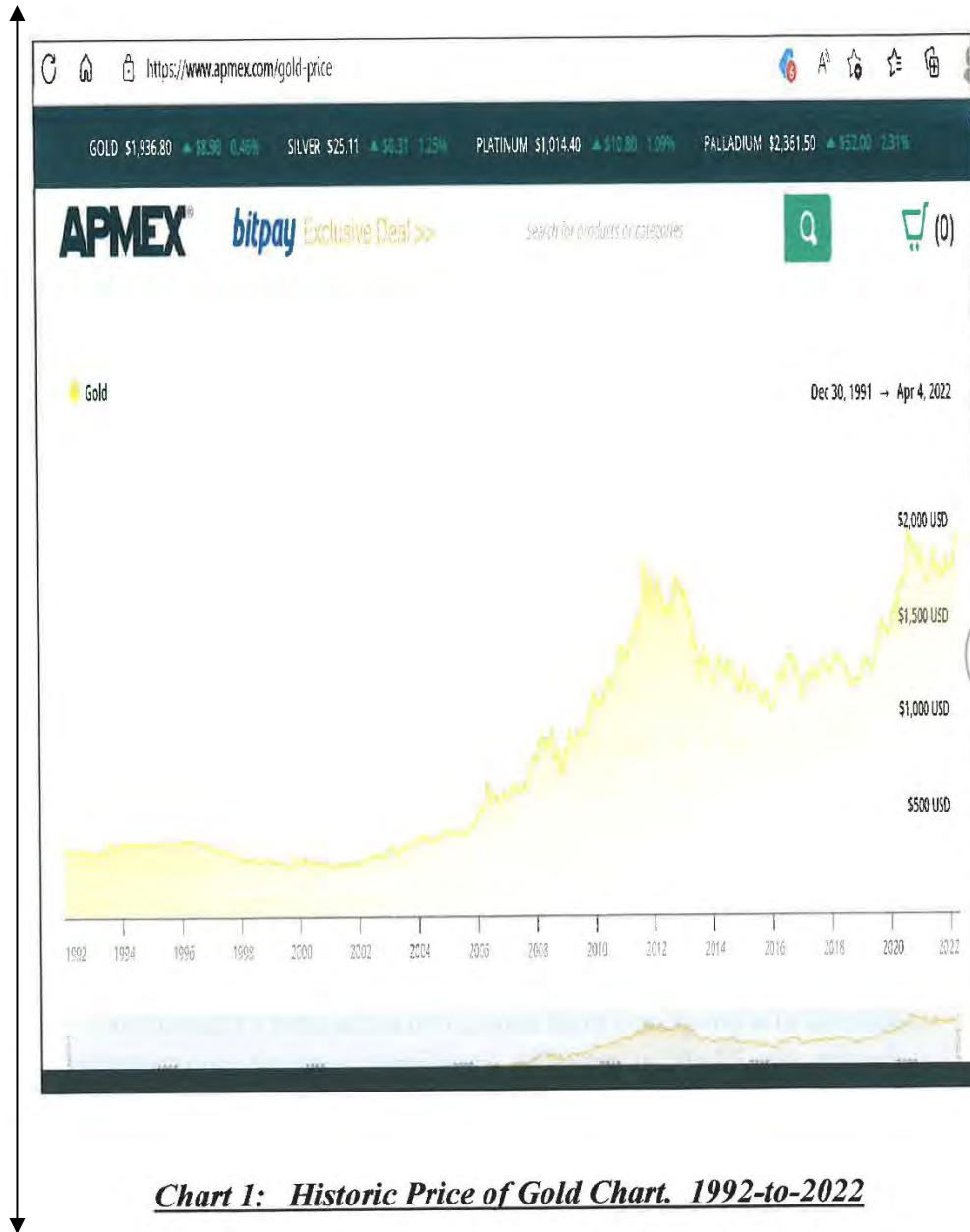
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*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*







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*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*





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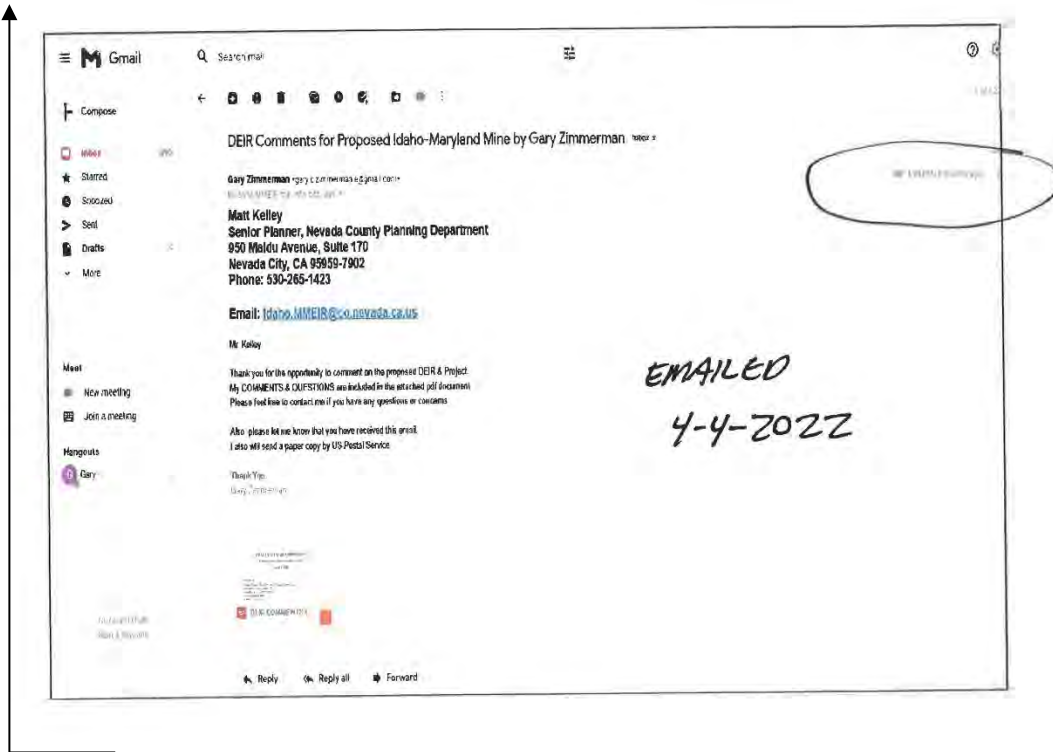
**Thank you for the opportunity to comment on this important document.**



**Gary Zimmerman  
Economist  
11453 Snowline Road  
Nevada City, California 94595**

*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*





*Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.*



## **INDIVIDUAL LETTER 269: GARY ZIMMERMAN**

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### **Response to Comment Ind 269-1**

This letter is a duplicate of Individual Letter 268. Please see responses to comments for Individual Letter 268.



Individual Letter 270

RECEIVED

Dist 3

FEB 24 2022  
NEVADA COUNTY  
BOARD OF SUPERVISORS

February, 2022

Nevada County  
Board of Supervisors

Dear members,

Please,  
Water more  
Precious  
than Gold.

No Mine!!!

Sincerely  
Ewen Moore  
320 Hubbard Rd.  
Grass Valley,  
Calif. 95945

Ind 270-1



## **INDIVIDUAL LETTER 270: GAVEN MOORE**

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### **Response to Comment Ind 270-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 271**

Nevada County Planning Commission      02-04-2022  
950 Maidu Avenue, Suite 170  
Nevada City, CA, 95959

Dear Commissioners Danny Milman, Laura Duncan, Robert  
Ingram, Mike Mastrodonato and William Greeno,

I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My reason is simple. The risk (environmental calamities, reduced property values, noise and traffic issues) is not worth the reward (a few new jobs and more gold to be stored in vaults around the world).

I am a resident of Nevada County and believe that Rise Gold corporation lacks either respect or understanding of the impact their mine project will have on the environment and people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,



Geoff Pollard  
800 Freeman Lane Apt 301  
Grass Valley, VA 95949  
925-323-4349  
gppollard@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley,  
Principal Planner Tyler Barrington



**Ind 271-1**



## **INDIVIDUAL LETTER 271: GEOFF POLLARD**

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### **Response to Comment Ind 271-1**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.





**Individual Letter 272**

Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902  
Idaho.MMEIR@co.nevada.ca.us  
With copy to: DEIRcomments@cea-nc.org

April 4, 2022

RE: Idaho Maryland Mine DEIR Comments

Dear Mr. Kelley

**Ind 272-1**

This letter is to provide comments on the Draft Environmental Impact Report prepared for the Idaho Maryland Mine project. I live at 14401 Pierite Road in Nevada City, and have been a resident of Nevada County for approximately eight years. I am also a former city planner (City of San Francisco) with nearly 20 years of experience with CEQA and planning review of California projects.

My comments are limited to two areas of the DEIR – Project Background and Hydrology. Both sections have significant flaws that, at a minimum require additional analysis and recirculation of the DEIR.

**Chapter 3.4 Project Background – Piecemealing**

**Ind 272-2**

Section 3.4 of the DEIR briefly discusses the directly related project of the Voluntary Cleanup Agreement and potential Remedial Action Plan under consideration for the Centennial Industrial Site. The section says, in pertinent part, "Under the plan, the project applicant would excavate soils within the former eastern and western tailing ponds and consolidate contaminated materials on-site, as well as stabilize contaminated materials within a small hot spot area by cement treatment prior to on-site consolidation. Without explanation as to why this significant earthwork, excavation and construction project would be excluded from the DEIR, the report concludes that this unapproved, uncompleted, hypothetical project would be presumed to represent the baseline condition for the Idaho Maryland Mine analysis. This is nonsensical and clearly piecemealing. Cumulative construction and operational impacts, including those related to air quality, water quality, truck trips, etc. have not been analyzed, must be added to the current analysis and the DEIR must be recirculated.

**Chapter 4.8 Hydrology and Water Quality**

**Ind 272-3**

Section 4.8 and specifically Mitigation Measure 4.8-2(a) proposes a well and groundwater monitoring scheme that effectively proves (because of the monitoring scheme proposed) that the ultimate impacts of the dewatering of mines that have been for decades underwater is unknown. Indeed, the impact of mine dewatering in this region has no remotely recent precedent. In the current mega-drought, it is very reasonable to assume that the removal of millions of gallons of groundwater from the mines will have the very predictable impact of





Ind 272-4

drawing nearby subsurface flows to the mines, potentially affecting not just 30 nearby wells but potentially hundreds or thousands of nearby well.

The mitigation measure goes on to state that any well that is reduced via dewatering by more than 10% (which could be as much as a 20' reduction in a 200' deep well) will be remediated or potable water produced by some other means, all at the project sponsor's cost. The fatal flaw with this logic is that there is a very reasonable likelihood that the number of wells impacted in this way could number in the multiple hundreds and therefore 1) cannot reasonably be replaced by NID water, 2) would represent in and of itself a significant increase in NID service area requiring its own CEQA review, and 3) could conceivably involve enough wells so as to be technically infeasible or financially impossible for the project sponsor to address. This would result in a reasonably foreseeable scenario where the project sponsor drags the community through a science experiment only to find out that it cannot afford the mitigations reasonably required by MM 4.8-2(a).

This impact must be correctly classified as Significant and Unavoidable unless and until the project sponsor agrees to a bond or similar irrevocable financial commitment equal to the cost of mitigating the impacts described above, and certainly well beyond just placing 30 of the most directly impacted neighbors on NID water.

Ind 272-5

Thank you for your care and consideration in the review and analysis of this project. As you probably can see from all the public concern it has engendered, a lot of us are very worried that this project is the wrong project for Nevada County at this time. While the promised economic benefits are not guaranteed whatsoever, we the residents of Nevada County will be left with the reality of another failed mining experiment and all the environmental impacts it will bring.

Geoffrey Nelson  
14401 Pierite Road  
Nevada City, CA 95959  
(415) 515-7105  
nelson.geoffrey@gmail.com



## **INDIVIDUAL LETTER 272: GEOFFREY NELSON**

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### **Response to Comment Ind 272-1**

This comment is introductory in nature and the commenter is concerned with two areas of the DEIR, Project Background and Hydrology. The comment is noted and responses to specific comments are provided below.

### **Response to Comment Ind 272-2**

Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

### **Response to Comment Ind 272-3**

The DEIR discusses the impact to private wells in Chapter 4.8 and found that the impacts would be less than significant after mitigation. (DEIR, 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 272-4**

The commenter is referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 272-5**

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.



**Individual Letter 273**

**From:** gerald thomas <tallpeople4@sbcglobal.net>  
**Sent:** Sunday, April 3, 2022 8:32 PM  
**To:** Idaho MMEIR  
**Subject:** Idaho Maryland mine

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Matt Kelley,

I am a 10 year resident of Nevada County residing in Nevada City. I have atrial fibrillation and have concerns about the air quality that this huge operation would have on our already poor air quality. For me carbon offsets which are mentioned in the report are simply not preventing pollution but merely buying permission to pollute. There is no way that this proposed hardrock mine will not degrade the air quality we currently have. Also once this mine is approved and begins operation, I do not believe that the levels of monitoring and enforcement necessary will take place. Because of the money involved which will mostly end up in the pockets of Canadian investors there will surely be lawsuits resulting from attempted enforcement of any mitigation required. The amount of money from this operation that Grass Valley or Nevada County will ever see will be a minuscule portion. As others have mentioned this company left the Canadian government with a mess to cleanup from a failed operation by the same CEO running Rise Gold. We need to do everything possible to combat the massive threat of climate change and allowing this gold mine to reopen would be one of the worst possible uses of this land with respect to climate change and air quality. I therefore strongly reject Rise Gold's bid to reopen this mine.

Sincerely  
Gerald Thomas  
316 Monroe Street  
Nevada City, CA 95959

**Ind 273-1**



## **INDIVIDUAL LETTER 273: GERALD THOMAS**

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### **Response to Comment Ind 273-1**

The comment expresses general concerns regarding air quality and climate change. Please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. CEQA Guidelines Section 15126.4 (c)(3) specifically mentions “Offsite measures, including offsets that are not otherwise required, to mitigate a project’s emissions” as one option for GHG mitigation. As such, the carbon offset mitigation within the DEIR is adequate and meets the requirements set forth by the CEQA Guidelines. Chapter 4 of this Final EIR contains a Mitigation Monitoring and Reporting Plan for all the required mitigation measures. In addition, the project will undergo annual inspections as required by SMARA. The commenter expresses general concerns regarding impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 3 – Operator Responsibility.



**Individual Letter 274**



To Matt Kelley, Senior Planner for the Nevada Planning Commission  
mattkelley@co.nevada.ca.us

To: Members of the Nevada County Planning Commission, the Board of Supervisors, and the Nevada County Planning Commission Staff, Matt Kelley, Senior Planner

Ind 274-1

I am writing to give my support to Wolf Creek Community Alliance's (WCCA) and Community Environmental Activists Foundation's (CEA Foundation) recent comments to you regarding the DEIR for reopening Idaho Maryland Mine.

WCCA's comments on the Biological Resources section 4.4 are detailed and extensive, 36 pages long, and extremely well done. As a biologist with a masters in renewable resources and one of the founding members of this organization I heartily endorse this. So rather than add more I am asking that you carefully read them and take all that is said into account when making you decision.

I am also writing to you to read carefully the CEA Foundation's comments, again extensive and based on research and commitment to our community and its environment. Their goal is, "**CEA Foundation advocates for responsible land use and environmental protection policies and actions in Nevada County. Our goal for Nevada County's future is a thriving community, a strong economy, and a healthy environment.**"

I have attended the ZOOMs that have been presented by Mine Watch sponsored by CEA Foundation.

I support all that they have presented to you about the DEIR and recommend that you not only carefully read their comments but go to: <https://www.cea-nc.org/category/the-idaho-maryland-mine/> for more information.

So rather than add more to the already extensive materials that you have received from these two groups, I am asking to be added on as a supporter of their comments.

Thank you for your time and energy in this extremely long and intense process. Please know and understand the negative impacts to our environment, our health, and economy if the Rise Gold application is approved.

Thank You,

Geri Stout

101 Bawden Ave

Grass Valley, CA 95945

A handwritten signature in black ink that reads "Geri Stout".



## **INDIVIDUAL LETTER 274: GERI STOUT**

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### **Response to Comment Ind 274-1**

The comment does not specifically address the adequacy of the DEIR, but points to other comment letters received. Please see Responses to Comment Letters Grp 6 to 8 and Grp 29 to 32. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





Individual Letter 275

*We DO NOT support*  
**support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can provide a strong economic future for today and for decades to come. Rise Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying jobs with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County residents and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible and innovative project for Nevada County. I urge the Board of Supervisors and County officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) GERI STOUT & KREG CECATELL

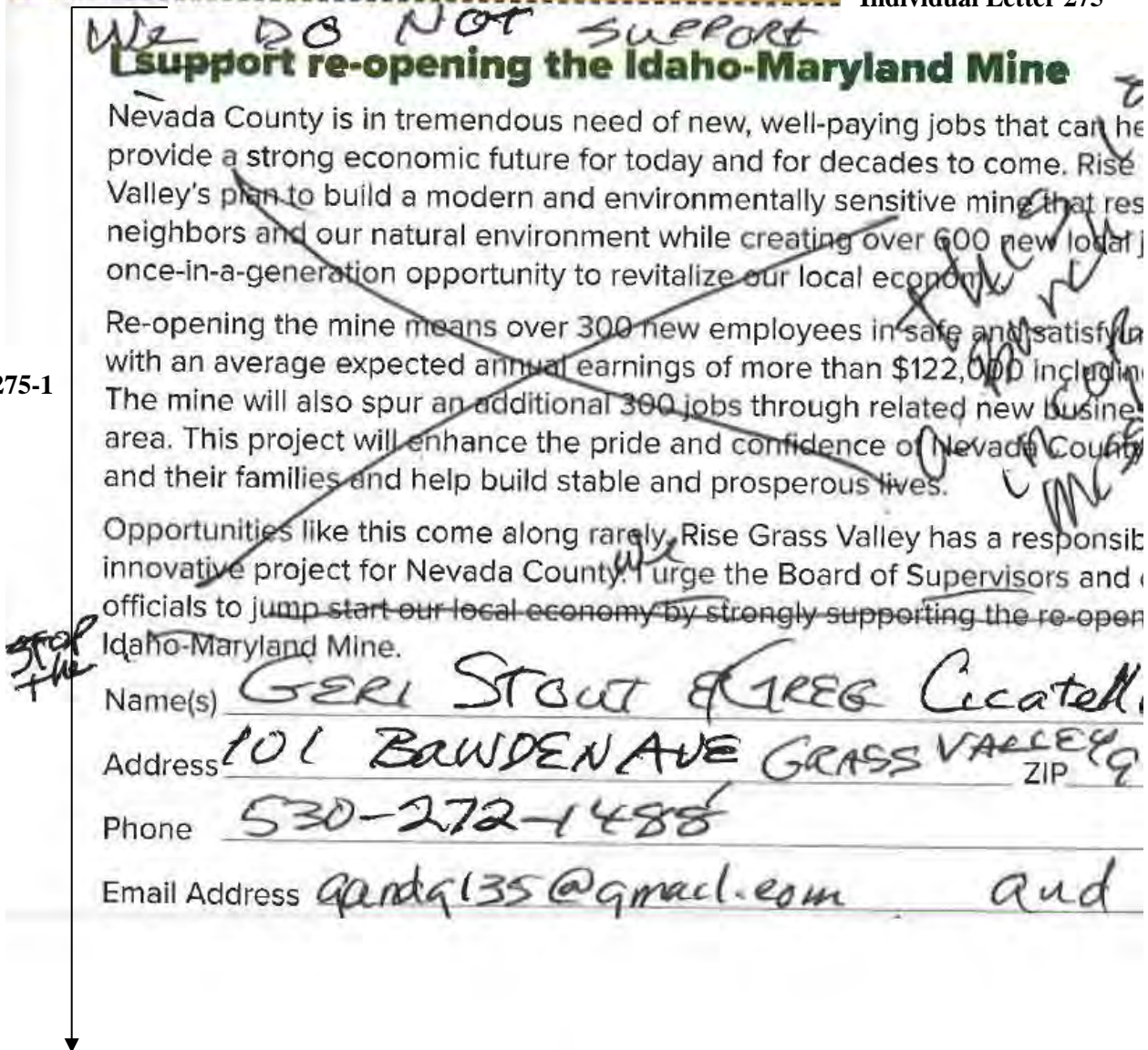
Address 101 BAWDEN AVE GRASS VALLEY CA ZIP 95949

Phone 530-272-1488

Email Address qandq135@gmail.com and and

Ind 275-1

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## **INDIVIDUAL LETTER 275: GERI STOUT AND GREG CICATELLI**

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### **Response to Comment Ind 275-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 276**

**From:** [Gert Snell](#)  
**To:** [BCS Public Comment](#)  
**Subject:** RISE MINE  
**Date:** Thursday, March 3, 2022 8:31:30 AM

**Dist 2**

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**Ind 276-1**

No Mine! Too much is at stake, please don't pursue this project for our beautiful community

Sent from my iPhone



## **INDIVIDUAL LETTER 276: GERRI SNELL**

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### **Response to Comment Ind 276-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 277**

March 15, 2022

Nevada County Planning Dept.  
950 Maidu Ave.  
Suite 170  
Nevada City, CA 95959

Re: Proposed mine project at the Idaho-Maryland Mine owned by Rise Grass Valley

Dear People,

**Ind 277-1**

I began reading the draft EIR. After an hour or so of plodding through the report I realized the reading and comprehension of the report is not for the layman, of whom I consider myself one. Although I gave up my attempt to absorb as much as I could, I do have strong opinions on subject of the mine. My opinions have been formed through reading articles, 'op-eds' and letters in The Union newspaper; by witnessing the environmental devastation caused by previous mining activity in the county; by my understanding of the track record of the principal owners of Rise Grass Valley; by conversations with my neighbors and by common sense.

I fear that allowing the mine to go forward would be devastating to:

1. the air and water quality in the county.
2. the people living in proximity of the mine by having their wells impacted by the lowering of the water table, by having the noise and vibration affect their quality of life and by lowering the value of their properties.
3. traffic conditions that will become far worse due to the volume of trucking created by the mining operations

**Ind 277-2**

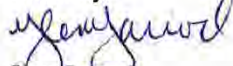
(It is my understanding that mitigating some of these problems was left ambiguous in the draft EIR).

**Ind 277-3**

I do not believe the mine will produce hundreds of jobs paying approximately \$90,000 a year for local workers as advertised in Rise's mailer. I can only imagine a great many out of town workers would need to be imported into the county, which already has an acute housing shortage.

The question in my mind is not this whether project should go forward or not, but rather why is any serious consideration being given to it at all.

Sincerely,



Glen Garrod  
PO Box 356  
Nevada City



Phone: 530-478-9710



## **INDIVIDUAL LETTER 277: GLEN GARROD**

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### **Response to Comment Ind 277-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 277-2**

The comment expresses a general opinion that mitigation was left ambiguous in the DEIR, but does not provide specific examples that would allow for a detailed response.

### **Response to Comment Ind 277-3**

Please see Chapter 4.9, Land Use and Population and Housing, of the DEIR regarding impacts related to housing future mine workers. Please see Master Response 2 – Social and Economic Impacts. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 278**

**From:** Glenna Rogers <gjr6121@att.net>  
**Sent:** Monday, April 4, 2022 1:02 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** Stop the Mine

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To Whom It may Concern.

I live on Dogwood Road (off of Greenhorn) in Grass Valley - approximately 1.75 miles from the mine. To get to my house I will have to pass the mine.

I do not this mine in my neighborhood. It will create:

- A. Endless noise and mine waste
- B. Most likely deplete our wells
- C. Create toxic waste
- D. Devalue our property. Who will want to buy our houses when we want to sell

**Ind 278-1**

Why are you so interested is destroying this community?  
An active mine does not belong in Grass Valley - PERIOD.

Would you like to live within miles of an active mine? I think not.

Thank you  
Glenna Rogers  
12100 Dogwood Road  
Grass Valley, CA 95945  
(510) 363-6120



## **INDIVIDUAL LETTER 278: GLENNA ROGERS**

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### **Response to Comment Ind 278-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 279



RISE GRASS VALLEY  
Rise Grass Valley  
PO Box 271  
Grass Valley CA 95945

P-5 P9 104  
Gordon Scott Mann  
12661 Torrey Pines Dr  
Auburn, CA 95602-8028

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TMG

FEB 18 2022

Dist 2

NEVADA COUNTY  
BOARD OF SUPERVISORS

*Dear Nevada County Board of Supervisors,  
How much of this is proven, and if wells are not impacted, why run the NID water line? Perhaps opening*

**THE IDAHO-MARYLAND MINE:  
A PROUD HISTORY**

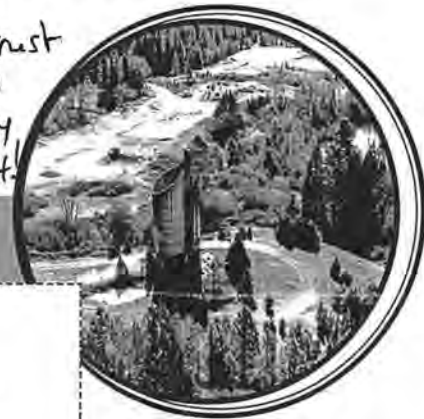
The Idaho-Maryland Mine was one of the most productive and best-known gold mines in the United States, producing approximately 2.4 million ounces between 1866 and 1955. The mine closed in 1956 as the fixed price of gold at \$35 per oz made the mining of American gold unprofitable.

Rise Grass Valley will reinitiate mining and will do so with a focus on green-friendly practices and minimizing the impacts to neighbors. The project will use modern, clean, state-of-the-art mining equipment and proven techniques to produce "green gold." The result is a project

*the mine is not a bad idea. Allowing Rise to open the mine is a bad idea. It has no significant impacts to water, air quality, and the natural environment or from noise or vibrations during operations.*

When in full operation, Rise Grass Valley's Idaho-Maryland Mine project will create hundreds of good-paying jobs and realize broad economic benefits for Nevada County.

*I do not trust Rise to send them any reply & have them count it!*



**Please fill out and send back to us your support for the Idaho-Maryland Mine**

**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) \_\_\_\_\_  
Address \_\_\_\_\_ ZIP \_\_\_\_\_  
Phone \_\_\_\_\_  
Email Address \_\_\_\_\_

**Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit [RiseGrassValley.com/contact](http://RiseGrassValley.com/contact) and sign up.**

Ind 279-1



## **INDIVIDUAL LETTER 279: GORDON MANN**

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### **Response to Comment Ind 279-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 3 – Operator Responsibility. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 280**

Comments on the Idaho-Maryland Mine Project Draft EIR

Via email to matt.kelley@co.nevada.ca.us Matt Kelley, Senior Planner Nevada County Planning  
Department 950 Maidu Avenue, Suite 170 Nevada City, CA 95959

To: Matt Kelley, Senior Planner, Nevada County Planning Department

Dear Mr. Kelley,

Thank you for the opportunity to review the Idaho-Maryland Mine Project Draft EIR. My compliments to you and the consultants that prepared and contributed to the document; it is generally a thorough and considered analysis of a complicated and large project. Yet, there are elements of the Draft EIR that are inadequate as written.

**Ind 280-1**

I offer comments primarily in subjects with which I have had direct experience during my career, CEQA process and analysis, and biological resources protection and mitigation. More specifically, my comments are on three topics: 1. Proposed biological resources mitigation measures, 2. Impacts to fish habitat, and 3. The alternatives analysis in the DEIR.

**1. Feasibility shortfalls in proposed biological resources mitigation measures.**

- a. Vague site protection requirements, raising questions of mitigation measure feasibility. There are multiple impacts to biological resources that are significant without mitigation, but which are found to be less-than-significant after proposed mitigation. These include significant impacts to the following biological resources:
  - i. Special-status plant species, including the pine hill flannelbush and other species (4.4-1).
  - ii. Candidate, sensitive, or special-status wildlife species, including the foothill yellow legged frog, California red-legged frog, California black rail, coast horned lizard, special-status bats, and raptors and migratory birds (4.4-2).
  - iii. Riparian, wetlands, and other sensitive natural communities (4.4-3).
  - iv. Cumulative loss of habitat for special-status species (4.4-6).

**Ind 280-2**

Most of the mitigation measures needed to reduce biological resources impacts below the level of significant rely on protecting the habitat where the species occur or may occur. For example, Mitigation Measure 4.4-1 (a) reads as follows:

*Prior to issuance of grading permits, the applicant shall record a Conservation Easement for the on-site Pine Hill flannelbush avoidance area, or use a similar land protection mechanism that runs with the land in perpetuity, to protect the Pine Hill flannelbush plants within the avoidance area. The management guidelines for the Conservation Easement or similar mechanism shall require that the habitat be managed for the Pine Hill flannelbush and its associated habitat. The applicant shall also record a Conservation Easement or use a similar land protection mechanism for any off-site areas not owned by the applicant where the transplants are to be located. Page 4.4-66.*

The feasibility of this measure cannot be determined as written. The measure initially calls for a conservation easement, but subsequently includes language that raises doubt: "or use a similar land protection mechanism..." What is this other mechanism? In the past, deed restrictions were sometimes used, but they have been found to be





inadequate in recent times due to lack of oversight and enforcement. Deed restrictions are no longer allowed for wetland mitigation in California due to their poor performance. If a conservation easement is to be used, there is no easement holder identified - this also could be a feasibility issue, since there needs to be an entity that is willing to hold the easement. Finally, it isn't enough to just put an easement on. There needs to be a funding mechanism for long-term monitoring and management. No funding of long-term monitoring and management is presented in the Draft EIR.

Conclusion #1a: With the uncertainties outlined above, the feasibility of the site protection measures is in doubt and the biological resources impacts 4.4-1 and 4.4-2 should be considered unmitigated in the Draft EIR. Note: in support of this conclusion, it would be logical for the reasoning in the Draft EIR's traffic impact section to also apply equally to biological mitigation measures. Impacts to the SR 174/ Brunswick intersection were found to be significant and unavoidable because "*Because the remaining funds for the intersection improvements are unknown, in terms of timing and contributing parties, the successful implementation of the intersection improvements is uncertain.*" Page 4.12-66. As explained above, the successful implementation of biological resources mitigation measures is also uncertain.

Ind 280-3

- b. Undefined mitigation measures for wetlands and waters of the U.S. and the State. The mitigation for jurisdictional wetlands and waters (Mitigation Measure 4.4-3 (c) reads, in part:

*To the extent feasible, as determined by the qualified biologist in coordination with the Corps, the project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area.* Page 4.4-90.

This statement raises fundamental question regarding the status of the project design and the likelihood that impacts can be minimized. Has the project been designed to avoid and minimize adverse effects? The Draft EIR should be able to answer this question, but does not.

Ind 280-4

A second part of the mitigation measure introduces even more questions. It reads:

*Compensatory mitigation can include but is not limited to the following: onsite and/or offsite wetland creation and/or restoration, purchase or placement of conservation easements, payment of an in-lieu fee, and/or purchase of mitigation credits at an approved Corps wetland mitigation or conservation bank.* Page 4.4-90.

This is too vague to assure feasibility. Are applicable mitigation credits readily available? If not, where could onsite and/or offsite wetland creation or restoration feasibly occur given physical constraints, land availability, and technical considerations? Onsite or offsite wetland creation/restoration requires a physically suitable real estate footprint, which is often difficult, especially in the foothills where topography can be a limiting factor. Permittee responsible mitigation has been shown again and again to have poor implementation and success. One of many studies documenting this is the National



Academy of Sciences, National Research Council's (NRC) "Compensating for Wetland Losses Under the Clean Water Act."

<https://nap.nationalacademies.org/catalog/10134/compensating-for-wetland-losses-under-the-clean-water-act>

In the NRC study, and others, a major cause for the failure of mitigation measures is the lack of oversight. This is the context of short duration permits, especially compared to the proposed 80-year mining permit. This 80-year period will transcend the careers of the permittees, the County staff overseeing the permit, and the state and federal professionals that share oversight responsibilities. This will compound the difficulties seen in the context of much shorter duration permits.

Conclusion #1b: With the unanswered questions outlined above, the feasibility of the wetland mitigation measures is not demonstrated and the biological resources impact 4.4-3 should be considered unmitigated in the Draft EIR.

2. **Lack of analysis of impacts to fish habitat.** The Draft EIR contains an analysis of the potential for the project to interfere with the movement of fish. However, there appears to be no analysis of the potential effects on fish habitat from the alteration of Wolf Creek hydrology. The proposed discharges of water from the mine site will change the timing and duration of flows in Wolf Creek and these changes could have an impact on fish habitat. Changes in water quality and temperature may also affect fish. Perhaps the Draft EIR is relying on the effectiveness of discharge permits to offset impacts, but the document should include a disclosure of these impacts.

Conclusion #2: The lack of analysis of impacts from hydrology alterations to fish populations in the Draft EIR leaves a fundamental environmental effect unaddressed, one that is reasonably foreseeable based on comparable experiences in other locations.

3. **Insufficient range of alternatives.** Section 6.3 contains a helpful discussion of the purposes of the alternatives analysis and the need to evaluate a range of reasonable alternatives. The alternatives included in the EIR need to meet *most* of the *basic* objectives of the project and be effective in addressing significant effects. The decision on whether or not to include alternatives should be taken in the overall context of the most fundamental purpose of an EIR – that of a disclosure document. In this context, the Draft EIR does not contain a full range of reasonable alternatives. Specifically, the Draft EIR does not contain an alternative that lessens the magnitude of proposed extraction. There is an alternative – number 4 – that discusses a reduced rate of extraction; but this alternative still envisions full extraction of resources and this assumption increases the operational life of the mine from the proposed 80 years to 130-160 years. The Draft EIR then goes on to note the various impacts that would be exacerbated by the longer operating period, such as risks from the ongoing transportation, underground storage, and use of explosives. The same extended operation assumptions drive the Draft EIR conclusion that effects of dewatering on groundwater would be worsened.

The Draft EIR needed to include an alternative addressing the scale of the project, not just the rate of extraction. So, for instance, a mine that would extract 500 tons per day (compared to the

Ind 280-5

Ind 280-6



proposed project rate of 1,000 tons per day), yet still only operate for 80 years could reduce the significance of the aesthetics impacts. Also, per my comments under item number 1 above, how much would the potential for mitigation measure oversight shortfalls would be reduced compared to Alternative 4. What would a reduced footprint, or a reduced pad height, alternative mean for the various impacts forecast? We don't know the answers to these questions because the Draft EIR does not contain a basic alternative to the scale of the proposed project. The Draft EIR states that reduced extraction would not meet the project alternatives, but does not disclose the financial details that would allow the public to review and verify this assertion.

Conclusion #3: The Draft EIR does not have a reduced scale alternative, an omission that deprives the public from understanding how a smaller sized project would influence the various impacts disclosed throughout the document. Alternative 4 is a reduced rate of extraction project, but the ultimate scale of that alternative is the same as the proposed project. Consequently, the Draft EIR is deficient in not analyzing a reasonable range of alternatives.

In closing, thank you for your professionalism in providing this massive document and the opportunity to review it.

Respectfully,

Greg DeYoung, AICP  
545 Jordan Street  
Nevada City, California 95959  
(530) 559-7770



## **INDIVIDUAL LETTER 280: GREG DEYOUNG**

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### **Response to Comment Ind 280-1**

Comment noted. This is an introductory comment and does not provide a comment on an environmental issue associated with the project.

### **Response to Comment Ind 280-2**

The commenter raises concerns regarding the feasibility of biological mitigation measures but does not provide specific detail about why those mitigation measures are infeasible. The mitigation measures require a variety of actions depending on the impact, ranging from additional state or federal agency permitting to preconstruction surveys, and each contains performance standards and timing making them consistent with CEQA.

The commenter specifically questions the feasibility of the conservation easement requirement in Mitigation Measure 4.4-1(a) for the Pine Hill flannelbush. It should be noted, the conservation easement is required prior to the issuance of grading permits; as a result, no impacts to Pine Hill flannelbush can occur until the conservation easement is in place. As noted by the commenter, the conservation easement (or similar mechanism) will require an easement holder, management and operations plan, and will be recorded with the County recorder. Please see Response to Comment Agcy 3-5.

### **Response to Comment Ind 280-3**

Mitigation Measure 4.4-3(c) is stating that every attempt will be made to avoid impacts to waters of the U.S. and state during project implementation. The mitigation measure continues with additional language requiring agency permitting when those “waters” cannot be avoided. Reasonable estimates of impacts to waters of the U.S. and water of the state were assessed in the DEIR, and standard mitigation to avoid and minimize impacts in coordination with Corps was included. The precise avoidance and minimization actions will be specifically determined after consultation with the Corps, which is engineering level detail. Engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.)

### **Response to Comment Ind 280-4**

The commenter questions the feasibility of compensatory mitigation. The comment does not include the full text of Mitigation Measure 4.4-3(c) which shows compensatory mitigation, if required, is part of the section 404 permit process for impacts to waters of the United State or jurisdictional waters of the State if they cannot be avoided. The regulatory agencies issuing these permits would include as conditions of those permits monitoring and performance criteria for wetland creation and/or restoration if chosen or required, as well as identification of contingencies that would be implemented in the event such mitigation failed. Note that this mitigation is required to be in place prior to ground disturbing activities, so no impacts would occur until mitigation acceptable to the regulatory agencies is in place. Additionally, compensatory mitigation could be implemented through the purchase of mitigation credits through the in-lieu fee mitigation program, which would not require any monitoring or performance criteria by the applicant, if such credits are purchased per permit requirements. An in-lieu fee compensatory mitigation program is up and running and available for permitted projects in Nevada County. The specific mechanism that is implemented to compensate for impacts to aquatic resources will ultimately be determined in consultation with the regulatory agencies. The list is provided not to imply that one or more of these methods might not be successful, but rather to be transparent about the full range of options available. It is inappropriate to finalize the mechanism of mitigation prior to permit discussions





with the agencies that have authority over the resources being mitigated. The CWA Section 404 permit from the USACE and the CWA Section 401 permit from the RWQCB will require full compensatory mitigation for all impacts to aquatic resources as conditions of the permits for the project.

#### **Response to Comment Ind 280-5**

Please see Master Response 34 – Resident Fish, Master Response 36 - Flows in South Wolf Creek, Master Response 32 – Temperature of Mine Water Discharge, and Master Response 35 – Discharge to South Wolf Creek, regarding the impacts to fish, discharge flow volumes, temperature, and quality, potential for erosion, and species impacts. CEQA guidelines require analysis of impacts to special-status fish, and as no special-status fish have potential to occur within South Fork Wolf Creek or Wolf Creek, no analysis of impacts to fish is appropriate.

#### **Response to Comment Ind 280-6**

DEIR Chapter 6 considered project alternatives. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers. Further, the alternative proposed by the commenter, to reduce throughput to 500 tons per day, but maintain the project life at 80 years, is substantially similar to Alternative 4, which was already addressed in the DEIR. The commenter’s proposed alternative would also cause a potential inconsistency with General Plan Policy 17.9 to “Encourage the mining of previously mined land, if such land still contains economically mineable minerals, so the land can be reclaimed for alternative uses.” The proposed alternative would leave economically mineable minerals unextracted after the life of the permit and would therefore conflict with this policy. This Alternative would also have fewer employment and economic benefits as compared to the proposed project, which would not satisfy Objective 7. Similar to Alternative 4, this alternative may reduce some traffic impacts due to less traffic volume per day. However, as this alternative could cause a new land use impact due to inconsistency with the General Plan Policy 17.9, and would not meet Objective 7, this alternative is dismissed from further consideration.





**Individual Letter 281**

**From:** Greg Wolfe <wolfe1080@att.net>  
**Sent:** Wednesday, March 30, 2022 8:19 AM  
**To:** Idaho MMEIR  
**Subject:** Mine proposal

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I am adamantly against the proposed mine project. You are all quite aware of the potential problems—water, pollution, noise, etc. Does our county have the resources to monitor all the various impacts? All those trucks constantly rumbling through town alone should be enough reason to deny any permits. Please do not allow the mine to reopen.

Greg Wolfe  
439 Kate Hayes  
Grass Valley

**Ind 281-1**



## **INDIVIDUAL LETTER 281: GREG WOLFE**

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### **Response to Comment Ind 281-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 282**

**From:** [Dr. Gregory Weisswasser ND](#)  
**To:** [hcbosupervisors](#)  
**Subject:** I am against the opening of the mine  
**Date:** Thursday, February 3, 2022 6:28:31 PM

**Dist 3**

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**Ind 282-1**

Dear Nevada County Board of Supervisors,  
I am writing to inform you that I am against the opening of the Idaho-Maryland mine by rise gold. I own a business and property in Grass Valley in the vicinity of the mine project. I am opposed to the mine as it will have negative effects on the local environment, lifestyle , traffic, watershed, air quality and more. Please do not let this deal go through. If it does it will push me to consider if Grass Valley is the place to continue my business and home of over 18 years.  
Sincerely,  
Dr. Gregory Weisswasser ND  
Owner of Whitewater Naturopathic

Sent from my iPad



## **INDIVIDUAL LETTER 282: GREGORY WEISSWASSER**

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### **Response to Comment Ind 282-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 283**

**From:** [gdelgado@earth-justice.org](mailto:gdelgado@earth-justice.org)  
**To:** [hdoofsupervisors](#)  
**Subject:** comment on Idaho Maryland Mine  
**Date:** Friday, April 1, 2022 11:06:32 AM  
**Attachments:** [DEIR statement march 2022.docx](#)

Dist 1

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Dear Supervisors,

A member of our organization, Earth Justice Ministries, read our statement at the recent public meeting about opposing the reopening of the Idaho Maryland Mine. The comments were limited to three minutes, so here is the statement in full.

Please take heed of the needs of this community and do not approve the reopening of the mine.

Sincerely,

Guarionex Delgado  
11328 Red Dog Rd.  
Nevada City, CA 95959  
530 264 6094 cell  
530 265 5976 home

Ind 283-1





## **INDIVIDUAL LETTER 283: GUARIONEX DELGADO**

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### **Response to Comment Ind 283-1**

The comment does not address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project. Please see Master Response 1 – Non-EIR/Administrative Issues.



**Individual Letter 284**

March 25, 2022  
950 Maidu Avenue, Suite 170  
PO Box 599002  
Nevada City, CA 95959-7902

To the Nevada County Planning Department,

**Ind 284-1**

I am a registered voter in Grass Valley and own my home on Hubbard Road. I will be impacted by the use of the precious water resources in the area and the pollution in the Glenbook Basin created by the additional truck/car traffic. I ask that the BOS and the Planning Commission reject the draft EIR for the following reason:

In section 4.3 the Draft EIR outlines the major sources of pollutants, which include, repeatedly, 'automobile and diesel trucks'. Further in section 4.3.2, there is the discussion of particulate matter including asbestos and crystalline silica.

**Ind 284-2**

The draft EIR indicates that the carbon offsets of the forests around will sequester 2,664 MT CO<sub>2</sub>e (page 4.3-17) over 80 years. This baseline is preproject. The project overview suggests that logging operations, mine preparation and soil/mine debris will disturb 104 acres of the 176 acre site. These acres will be deforested, the mine debris will cause more particulate pollution and the suggested trucking operations will only contribute to the county's existing struggle to reach a healthier air quality for Western Nevada county. It is notable that there will be up to 100 truck loads of material moved from the Brunswick site to the Centennial site daily. The pollutants and noise from these operation alone will significantly affect traffic noise and congestion along the roads used, changing the rural nature of the area in addition to adding pollutants.

**Ind 284-3**

It appears to me to be a project that uses valuable resources that are in short supply, particularly water, in our community, as well as contribute to the questionable air quality that exists in our valley community.

**Ind 284-4**

In an effort to encourage the BOS AND PLANNING COMMISSION to **REJECT the Idaho-Maryland Mine Draft EIR**, I respectfully submit my concerns. The quality of life in my neighborhood will be adversely affected and, I believe, these adverse effects will be felt throughout the county.

Gwen Moore  
320 Hubbard Road  
Grass Valley, CA 95945

*Gwen Moore*



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## **INDIVIDUAL LETTER 284: GWEN MOORE**

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### **Response to Comment Ind 284-1**

The commenter states that the project will impact water resources and pollute the Glenbrook Basin with additional traffic. The commenter also states that the project will result in negative air quality impacts, specifically asbestos and crystalline silica. The commenter does not state how the DEIR is inadequate with regard to the stated impacts. Air quality impacts, including asbestos and crystalline silica, are examined in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). Impacts to water resources are analyzed in Chapter 4.8 (Hydrology and Water Quality). The commenter is also referred to Master Response 21 – Conservatism of Silica Assumptions, Master Response 22 – Conservatism of Asbestos Assumptions, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 284-2**

The commenter summarizes a portion of Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) which estimates the carbon sequestration loss from deforestation of the 24 acres at both project sites. (DEIR, p. 4.3-17.) The commenter also states the project's trucking component will further degrade the County's air quality. However, the commenter does not identify any inadequacies of the DEIR. Carbon sequestration losses from the removal of forest areas by the project are included in the greenhouse gas emissions of the project. Air emissions from trucking is included in the analysis of air quality in Chapter 4.3.

### **Response to Comment Ind 284-3**

The commenter states that the transport of engineered fill to the Centennial Industrial Site will result in pollutants, noise, and congestion. The commenter does not provide any additional information. Air pollution from trucking is analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR; noise from trucks is analyzed in Chapter 4.10 (Noise and Vibration) of the DEIR; and traffic impacts from trucks are analyzed in Chapter 4.12 (Transportation) of the DEIR.

### **Response to Comment Ind 284-4**

The commenter states that the County should reject the project. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.



Individual Letter 285

HANK MEALS  
Historical Research & Interpretation  
Writing & Photography  
PO Box 111 Nevada City CA 95959  
hmeals@nccn.net  
530.478.9637/ 530.559.5508



Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

April 2, 2022

*Civil engineers like to say, "What can't be measured can't be managed", while Alexander von Humboldt observed that, "What speaks to the soul, escapes our measurements."*

Dear Nevada County Board of Supervisors,

To quote the introduction to the EIR, "The proposed project would reinstate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year permit period with gold mineralization processing and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations". Calm down a moment and try to visual what this will look like 1, 5, 20, 40 and 80 years out. What provisions are there to continually monitor "Necessary Impacts" that include a degradation of the environment on the physical and mental health level? What other permittee has been granted an 80-year window to do business (the profits of which will most assuredly leave this region).

Ind 285-1

I've lived in Nevada County for over 50 years, it's my home. People will frequently remark, "You must have seen a lot of change", which is true, but nothing compared to impacts associated with the Rise Gold proposal. As a former Tahoe National Forest archaeologist, I frequently worked with mining claimants and I never saw a mining operation that didn't produce more resource damage than that predicted by the "Plan of Operation." Almost any "necessary change" caused by "unforeseen conditions" was more calamitous than could have been predicted.

Mining creates an impact that gains its own momentum, self-importance and dare I say, arrogance. Rise Gold's proposal represents colonization by heavy industry. This proposal will create enormous and irreversible change in Grass Valley and Nevada City. Gold mining is gambling, despite the cascade of science in this EIR. I don't envy the task of our five County Supervisors (Is that sufficient representation?) who must





Ind 285-2	interpret this ill-advised proposal and determine if industrial scale gold mining, admittedly part of our past, will dominate our future. ... Here are a few specific issues that loom large for me:
Ind 285-3	<p>• TOXIC SUBSTANCES: “Extensive site investigation, overseen by DTSC, has identified mill tailings, waste rock and affected soil at the site that contain lead, arsenic, mercury and other metals at concentrations exceeding background soil metals concentrations and regulatory benchmark concentrations. Elevated soil metals concentrations present a potential human health risk resulting from routine, long-term exposures, as well as ecological concerns in terms of impacts to plant and animal species. (Chapter 1 – Introduction Page 1-4).”</p> <p><u>Comment:</u> After all the good work done by The Sierra Fund and the South Yuba Citizens League to call attention to toxic substances and remediation in the Bear and Yuba Rivers you can’t really tolerate this. Too many people are now aware of the true costs of industrial level gold mining.</p>
Ind 285-4	<p>• BIOLOGICAL AESTHETICS, AGRICULTURAL and FORESTRY RESOURCES: “... for the purposes of the analysis of biological resources [&amp; Aesthetics &amp; Agricultural and Forestry Resources], the environmental baseline for the Centennial Industrial Site has been adjusted to reflect the <i>reasonably anticipated</i> conditions of the site following the remediation activities (CEQA Guidelines Section 15125(a)). Chapter 1 – Introduction Page 1-6).”</p> <p><u>Comment:</u> The proposed remediation appears to be more concrete to make nature behave?</p>
Ind 285-5	<p>• NOISE, a very big concern that will affect: Quality of sleep, disturb wildlife and pets, mental health, residences and assisted living facilities located above the mining excavations, it will also negatively affect people subject to seizures, pregnant women, degrade the experience for Empire Mine State Park visitors and agitate students and teachers in nearby schools.</p> <p>• INCREASED LIGHTING “In addition, while lighting at the Brunswick Industrial Site has been designed to minimize light spill over onto adjacent properties, as discussed in the Aesthetics chapter of this EIR, new light structures are proposed throughout the Brunswick Industrial Site at strategic locations for pedestrian safety along internal walkways and around equipment areas, and to enhance the security of the property. Outdoor lights would be provided at project entry points, within the surface parking lot, and around the Brunswick Shaft and Process Plant and proximate buildings.” (Chapter 4.11 – Public Services and Utilities Page 4.11-27).</p>





Ind 285-6

Comment: Advances in lighting technology will surely advance in the next 80 years so this issue will need to be periodically reevaluated. I'm certain that lighting associated with the proposed project will be visible in Nevada City, a town based on tourism, requiring a particular lighting design

• **SIGNIFICANT AND UNAVOIDABLE IMPACTS:** "Significant and unavoidable cumulative impacts are impacts on the environment that result from *the incremental impacts* of a proposed project when added to other past, current, and future projects and cannot be alleviated to a less than cumulatively considerable level. Such impacts can result from individually minor but collectively significant actions that occur over time." (*Chapter 4.0 – Introduction to the Analysis Page 4.0-3*).

Comment: This is a significant issue that requires frequent monitoring for the duration of the proposed task, which RISE GOLD claims will take 80 years to complete.

Ind 285-7

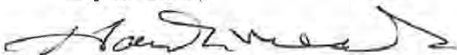
"Nonetheless, cumulative buildout in the geographic area would result in a change in the visual character of the region, which would be considered a significant cumulative impact. As discussed under Impact 4.1-2 above, the proposed project would substantially degrade the character of the Centennial and Brunswick Industrial Sites, though they are zoned for industrial development and there are surrounding industrial land uses in the vicinity of the project sites. Therefore, the project's incremental contribution to the significant cumulative impact would be cumulatively considerable and significant and unavoidable." (*Chapter 4.1 – Aesthetics Page 4.1-30*)

"Based on the above, the proposed project's incremental contribution to this potentially significant cumulative impact would be **less than cumulatively considerable**."

"Mitigation Measure(s) None required." (*Chapter 4.1 – Aesthetics Page 4.1-32*).

Comment: I fail to see how this conclusion is reached?

Do your Best,



Hank Meals



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## **INDIVIDUAL LETTER 285: HANK MEALS**

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### **Response to Comment Ind 285-1**

The comment does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 285-2**

As discussed further on pages 1-5 and 1-6 of the DEIR, separate CEQA review of a Remedial Action Plan (RAP) is being conducted with DTSC as the CEQA lead agency. DTSC released the CEQA document (Initial Study/Mitigated Negative Declaration [MND]) for the "Centennial M1 Property Clean-Up Project Remedial Action Plan" project, SCH# 2021070473) for public review on July 26, 2021. The IS/MND identifies mitigation measures with which Rise, as the property owner responsible for implementing the Centennial M1 Property Clean-Up Project Remedial Action Plan (Centennial Clean-Up Project) would need to comply, prior to and during remedial activities associated with the RAP, that would ensure that physical impacts to the environment are mitigated to a less-than-significant level. Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA. The comment does address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 285-3**

Please see Master Response 4.

### **Response to Comment Ind 285-4**

Please refer to Chapter 4.10, Noise and Vibration, regarding impacts related to noise. The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 285-5**

Impacts related to light and glare were addressed in Impact 4.1-3 within Chapter 4.1, Aesthetics, of the DEIR. As discussed therein, light spillover is not projected to occur off-site. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency, such as lighting requirements, in deciding whether to approve the project.

### **Response to Comment Ind 285-6**

The comment is a general comment about significant and unavoidable impacts, stating they should be monitored over time. Chapter 4 of this Final EIR contains a Mitigation Monitoring and Reporting Program for all required mitigation measures and the site will be inspected annually as required by SMARA. The comment does not specifically address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Response to Comment Ind 285-7**

Long-term changes in visual character associated with the proposed project in combination with cumulative development and the creation of new sources of light or glare associated with the proposed project in combination with cumulative development are discussed under two separate impact statements, as shown in Chapter 4.1, Aesthetics, of the DEIR. As the commenter noted, Impact 4.1-4 related to long term changes in visual character was determined to be cumulatively considerable and significant and unavoidable (DEIR p. 4.1-30); however, Impact 4.1-5 related to the creation of new sources of light or glare was determined to be less than cumulatively considerable (DEIR p. 4.1-32).



**Individual Letter 286**

**From:** [Harry Woodum](#)  
**To:** [hdbosupervisors](#)  
**Subject:** Idaho-Maryland Mine  
**Date:** Monday, March 21, 2022 3:49:35 PM

Dist 1

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To the Board of Supervisors:

Hello,

I hope everyone has managed to stay well during the last couple of years. We have faced many big challenges in the last few years, the pandemic, climate change and drought ramping up wildfire season and all that that brings, to name just a few.

I have been a Nevada County resident for 30 years.

As residents of this community, we are now facing another big challenge that some might even call a crisis. I am referring to the proposal to re-open the Idaho-Maryland mine.

This looms so large; I don't even know where to begin but I will try to be brief. I know there is much to consider and I'm sure, I hope, you have heard from a lot of residents. To me, it's a real no-brainer that it even requires any consideration.

I have received brochures in the mail from Rise stating just how little impact the mine would have on the area and it could not be anymore obvious that it is a sales job and a bad one at that, driven by the desire for money. It's a sales job by a company whose members live thousands of miles away and have no connection to or concern about this community. The desire to make money trumps all sense of integrity, morals, and responsibility to the people who live here.

There are many arguments against the mine and I can't think of any arguments in favor of it that justify the long-term permanent damage and destruction to a place people call home. I'm sure by now you have been informed about the impact of the process in much greater detail than I could ever provide.

This is not an industrial area and this proposal is counter to what makes this area such an appealing and attractive place to live. The arguments against are obvious, like excessive water usage that cannot be replenished, air pollution not only from the mining process itself, but from the constant truck traffic needed for transport, and the 24-hour noise levels that will drastically change

Ind 286-1





- the environment for residents.
- Ind 286-2** Speaking of wildfires, drought and water depletion, I think water usage alone is enough reason to say NO. I read a report that stated this process would use 700 million gallons of water in six months and we know that it will be pulling from the aquifer or will directly affect it. That is 700 million gallons that will in all likelihood, never be replaced when taking into consideration the long-term projections of climatologists regarding drought and declining snowpack. That is 700 million gallons that our ever-growing population needs for everyday living. That is 700 million gallons that we desperately need during fire season which is becoming longer and longer. That said, I don't know how reopening the mine could even be a remote possibility.
- Ind 286-3** And how much would truck traffic impede fire evacuation?
- The member-owners of Rise are too disconnected from this community to even have a voice. Would they want to live in the middle of an industrial area? Do they currently live in the middle of an industrial area? Perhaps that should be a pre-requisite before this could ever happen. Maybe they should be required to become permanent residents/homeowners who actually live here directly in the path of all the traffic and noise. I wonder how they could justify such a project then.
- Ind 286-4** To sum up and reiterate, I believe it is imperative that we put environment above profit, profit that will most benefit Rise member-owner/investors who live far away and who will be unaffected by the destruction of what the community here calls home. The investors stand to gain a lot, while we stand to lose more than can ever be recovered and, in the end, will experience destruction that far outweighs any ultimate financial gain. No amount of money or addition of jobs can compensate for the air, ground, water and noise pollution, disruption to community, devaluation of residential property, and overall environmental destruction that will affect this area for generations.
- As residents here, I implore you to take the long view into account when making your decision.
- Thank you and best regards,  
Harry Woodum





## **INDIVIDUAL LETTER 286: HARRY WOODUM**

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### **Response to Comment Ind 286-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 286-2**

Please refer to Chapter 4.8, Hydrology and Water Quality, as well as Chapter 4.11, Public Services and Utilities, of the DEIR for more information related to impacts regarding water usage. Please also refer to Master Response 13 through 16 regarding groundwater. The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 286-3**

Please see Master Response 5 – Evacuation Zones.

### **Response to Comment Ind 286-4**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 287**

**From:** [Wyeth Harry](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** RISE GOLD Draft Eir Comment  
**Date:** Wednesday, March 16, 2022 7:43:13 AM

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Ladies/Gentlemen:

Please accept the following individual comment on the portion of the draft EIR on this proposed project identified on page 253 in section 4.1-5, dealing with "new sources of light or glare".

The conclusion reached in the DEIR is that "the project's contribution to the significant cumulative impact [of light pollution] would be "**cumulatively considerable and significant and unavoidable**" [emphasis original] (section 4.4.4). Yet, the following section reasons that the cumulative lighting impact would be "**less than...considerable**" (page 253).

The inconsistencies are obvious, and the overall reasoning of the total effect of lighting from the mining site is poor. The mine site has almost no lighting at present, and the general area is dark-sky friendly, quiet, and serene. Not only would construction and operation of the mine dramatically change this, the presence of nighttime lighting, not matter how shielded, would cause a serious increase in lighting and a huge and serious detrimental effect on aesthetics.

The DEIR is deficient in these matters.

HARRY B. WYETH  
14393 Osborne Hill Rd.  
Grass Valley, CA 95945  
530-798-6566

Ind 287-1



## **INDIVIDUAL LETTER 287: HARRY WYETH**

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### **Response to Comment Ind 287-1**

The commenter is comparing conclusions to two different impacts. Impact 4.1-4 related to long term changes in visual character was determined to be cumulatively considerable and significant and unavoidable (DEIR p. 4.1-30); however, Impact 4.1-5 related to the creation of new sources of light or glare was determined to be less than cumulatively considerable (DEIR p. 4.1-32).



**Individual Letter 288**

**From:** Heidi Belforte Breuer <heidipi85@yahoo.com>  
**Sent:** Thursday, March 24, 2022 9:43 AM  
**To:** Idaho MMEIR  
**Subject:** Opposition to Idaho Maryland mine

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Hello,

**Ind 288-1**

As a Grass Valley resident and voter, I'm writing to voice my significant concerns regarding the proposed Idaho Maryland mine. I am a constituent in Heidi Halls jurisdiction. I am gravely worried about findings in the mine's environmental impact report. The impacts to air via pollution, noise due to mining activities (trucks, explosions etc), and truly unknown impacts to water supply are all unacceptable. These impacts will be extremely difficult to mitigate. As we enter into another draught year with unknown outcomes, we cannot predict with scientific means the long term effects over 80 years and I thus distrust the thoroughness of this EIR.

**Ind 288-2**

I hold a bachelors degree in zoology from UC Davis and have studied animal habitat management. The EIR did not study impact to birds, animals and other creatures beyond the site. I'm convinced that there will be impacts beyond the mine grounds to our natural environment in surrounding areas.

**Ind 288-3**

Please do not allow this abomination. Grass Valley is not the right place for this potential rape of our land.

Kind regards,

Heidi Belforte Breuer  
18354 Raccoon Trail  
Grass Valley



## **INDIVIDUAL LETTER 288: HEIDI BREUER**

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### **Response to Comment Ind 288-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 288-2**

Impact to birds, animals, and other creatures is addressed in Chapter 4.4, Biological Resources, of the DEIR. Please see Master Response 30 – Biological Study Technical Adequacy and Master Response 37 – Birds and Raptors. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





Individual Letter 289

Matt Kelley, Senior Planner  
950 Maidu Ave, Suite 170  
Nevada City, CA 95959

Ind 289-1

I am concerned about the increase in traffic, asbestos release, and noise/vibrations if the Idaho Maryland mine were reopened. I live near the proposed mine, just above Union Hill School and next to Empire Mine State Park. I have lived in my home for over 40 years. I am able to currently hear noise from the mine area and intersection at Brunswick as well as along highway 174.

I find the DEIR is inadequate in how it collected data and proposed mitigations in the areas of increased traffic, the release of asbestos from rock, and the noise the mining operation will generate.

Ind 289-2

The DEIR in the Wildfire chapter identifies the following expected traffic each day for haul trucks and transports for waste rock (see below). *This list does not include the cars of employees coming and going, other service vehicles making deliveries, picking up items or performing inspections and audits.*

Chapter 4.13 – Wildfire Page 4.13-16 & 17 (pdf pages 382-385)

- the average transport of engineered fill will be 1,000 tons per day
- Truck payloads will be approximately 20 tons per truck and therefore will require up to a maximum of 100 round trips per day and an average of 50 round trips per day, over a 16-hour period (6:00 AM to 10:00 PM). (NOTE: Is it 100 one-way trips that when driven out and back become 50 round trips?)
- Up to 18 additional truck trips could occur per day for various operations (gold concentrate shipping, materials deliveries, etc.)
- approximately five years, trucks would transport barren rock from the Brunswick Industrial Site to the Centennial Industrial Site or Brunswick Industrial Site engineered fill areas. 7 days a week/16 hours per day
- After full placement of fill at the Centennial and Brunswick Industrial Sites to the pad design elevations, the need for hauling of engineered fill would continue due to ongoing mining over the use permit term of 80 years, and thus, hauling would shift entirely to local and regional markets, with the maximum truck trips per day remaining at 100, with a daily average of 50
- Off-site haul of gold concentrate will average one truck trip per a day using Brunswick Road to SR 20/49.
- Hauling of fuel and other freight, including explosives, would occur using Brunswick Road to SR 20/49.
- Over the life of the project, up to 118 haul truck round trips would occur on Brunswick Road during the hours from 6:00 AM to 10:00 PM, seven days a week.

That is a tremendous amount of traffic to add to a secondary arterial. Its also a tremendous amount to go through mostly residential neighborhoods. That much constant large truck traffic



- ↑
- and the noise they generate and additional personal vehicles has a negative impact on the traffic flow and visual aesthetics along Bennett and Brunswick.
- Ind 289-3** When Rise investigators looked at Nevada County intersections that Rise considers in planning its routes, the LOS rating was D or better and was a C in rural regions. (pdf page 877) But when the additional traffic is added from mining operations, the LOS will decrease.
- Ind 289-4** The plan to safeguard against asbestos airborne release in the removal, transport, and dumping of waste rock is not adequate. The plan by Rise assumes that the asbestos content will continue to be less than 0.01% (3-20). That assumption may not hold true for the actual rock removed. Testing for the actual content percentage may take significant time and there is nothing in the plan that says Rise will stop the operation until that data is determined and then have workers return to work. If these tailings were dumped at Centennial or on the Brunswick site it is unclear how the asbestos will be abated. Spraying with water for dust control will only work as long as the dust stays wet and wind isn't an issue. The plan described in the DEIR lacks descriptions of testing and controlling for the significant health hazard, asbestos.
- Ind 289-5** In addition to greatly increased traffic, the noise of blasting, crushing and processing the rock will be increased as well. Now the noise from the Brunswick /Bennett-Greenhorn area can be heard from my home above the mine and next to Empire State Park near Union Hill. Friends on Banner Mountain can hear noise where he lives. The sensors were placed near the borders of the mine sites but the sound tends to carry much further and often is deflected up the hills. Secondly, as people have made a great effort to remove ladder fuel and thin trees, noise from traffic and the airport is much more noticeable. The data used is from the summer of 2018 and December 2018. New surveys should be conducted to determine the new ambient noise levels in the existing sensor areas and more that move up in elevation. Then recalculated to include nearly 8 diesel trucks an hour and the noise of heavy equipment, crushers, blasting and generators. The current data is inadequate for the area today.
- Ind 289-6** Another concern is the 6 am to 10 pm window for excessive noise and/or vibrations from the mine transporting waste fill, blasting and processing. It seems that residents should be able to have reasonable quiet for the evenings in their homes and outside in their yards.
- Respectfully,
- Helen Carl Martini  
Gerald Martini  
11613 Lower Pine Hill Drive Ext  
Grass Valley, CA 95945



## **INDIVIDUAL LETTER 289: HELEN AND GERALD MARTINI**

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### **Response to Comment Ind 289-1**

The commenter states that the DEIR is inadequate in the areas of traffic, asbestos and noise but provides no specific reasons for inadequacy. The commenter is referred to Chapters 4.12 (Transportation), 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), and 4.10 (Noise and Vibration) of the DEIR. The commenter's opposition to the project is noted for the decisionmakers. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 289-2**

The commenter states that the DEIR fails to analyze traffic impact from employees commuting to the project site. Traffic impacts, including employee and service vehicles, are extensively analyzed in Chapter 4.12 (Transportation) of the DEIR. The commenter is referred to Table 4.12-8 and Table 4.12-9. The commenter is also concerned about traffic noise generated from the project. Noise from traffic is analyzed in Chapter 4.10 (Noise and Vibration) in the DEIR. The aesthetic effect of trucks traveling along the surrounding roadways is a temporary condition and does not result in a permanent change in the overall aesthetics of the surrounding area. Project traffic on Brunswick Road would be from trucking (6:00AM to 10:00PM) and employees during shift change. Over the life of the project, up to 118 haul truck round trips would occur on Brunswick Road during the hours from 6:00 AM to 10:00 PM, seven days a week. On an hourly basis, this equates to approximately 7.4 haul truck round trips per hour on Brunswick Road.

### **Response to Comment Ind 289-3**

The commenter states that the DEIR indicates Level of Service (LOS) will decrease with the addition of project traffic. The LOS for each individual intersection studied in the DEIR varies and is not consistently LOS D or C, as stated by the commenter. The addition of traffic from mining operations does not lower the LOS of most intersections analyzed. The commenter is referred to Chapter 4.12 (Transportation) of the DEIR.

### **Response to Comment Ind 289-4**

The commenter states that the DEIR's analysis of asbestos impacts is inadequate. Detailed descriptions, analysis, management plans, and mitigation measures for the management of asbestos are provided in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR. Prior to underground gold mining, intensive planning efforts will be conducted as required under the ASUR plan and as required to meet state and federal regulations and achieve safety, environmental, and economic goals. Please see Section 6.0 of the ASUR Plan (Appendix E.2 of the EIR). Underground mine planning, as required in the ASUR plan, includes exploratory drilling, geologic mapping, material logging, and testing. These same processes also ensure future mining operations avoid and manage rock types that may contain naturally occurring asbestos to ensure that applicable thresholds are not exceeded. (Id.) In other words, the mandatory mine planning that is required by the DEIR in the ASUR Plan will provide information to the mine operator on asbestos content of rock prior to mining that area. That information can then be used to avoid areas, if any exist, with asbestos content that would make it infeasible to comply with the 0.01% asbestos content limit required by the ASUR Plan.

The commenter is also referred to Master Response 22 – Conservatism of Asbestos Assumptions, and Master Response 23 – Adequacy of sampling – Asbestos.



**Response to Comment Ind 289-5**

The commenter is concerned about noise impacts from the blasting, crushing, and processing of the underground mining operation. The commenter also states that the DEIR's noise data is outdated and new surveys should be conducted. Regarding the noise impacts, no crushing of rock is proposed on the surface. The remaining noise impacts related to the operation at the Brunswick site were analyzed in Chapter 4.10 (Noise and Vibration) and impacts were found to be less than significant. The commenter is also referred to Response to Comment Ind 617-4.

**Response to Comment Ind 289-5**

The commenter is concerned about noise impacts of the project but does not state how the DEIR is inadequate. Noise impacts, except for the construction of the water pipeline, have been determined to be less than significant after mitigation. The commenter is referred to Chapter 4.10 (Noise and Vibration) of the DEIR.





**Individual Letter 290**

**From:** Holly Ahrens <hollywoodnot@gmail.com>  
**Sent:** Wednesday, March 23, 2022 8:44 AM  
**To:** Idaho MMEIR  
**Subject:** Mine

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Dear Mr. Kelly:

My name is Holly Ahrens and my husband and I have been residents here in Nevada County for 17 years. The great outdoors and the natural habit drew us to this fabulous area.

I fear this habitat is now in jeopardy with the proposed mine and I am very much against it due to its effect upon it. I am concerned about its impact on our air quality and our water quality. It very likely will drain our ground water sources which may affect our wells that are already being threatened by droughts. I am also troubled by the thought of the diesel fumes and constant noise the equipment will put out. This mine will definitely affect our quality of life in many ways in Nevada County.

As I understand this proposal, there is no independent monitoring of any of these issues and I would like this inadequacy to be addressed. I would also appreciate a response to my concerns as they are the same as just about everyone I know around this area. We already have so many reasons to flee California with the drought, fire and tax issues, and we don't need another reason to leave.

Sincerely

Holly Ahrens

Ind 290-1





## **INDIVIDUAL LETTER 290: HOLLY AHRENS**

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### **Response to Comment Ind 290-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment also notes that there is no independent monitoring of these issues, but does not make clear to what issues are being referred. All of the technical reports used to support the preparation of the DEIR were independently peer reviewed by technical experts hired through the County. In addition, on-going inspections of the site will occur annually as required by SMARA. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 291**

March 23, 2022

Nevada County Planning Department  
950 Maidu Avenue, Ste 170  
Nevada City, CA. 95959-790

Attn: Planning Commission/Board of Supervisors

To whom it may concern:

My name is Holly Ahrens and my husband and I have been residents here in Nevada County for 17 years. The great outdoors and the natural habit drew us to this fabulous area.

I fear this habitat is now in jeopardy with the proposed mine and I am very much against it due to its effect upon it. I am concerned about its impact on our air quality and our water quality. It very likely will drain our ground water sources which may affect our wells that are already being threatened by droughts. I am also troubled by the thought of the diesel fumes and constant noise the equipment will put out. This mine will definitely affect our quality of life in many ways in Nevada County.

As I understand this proposal, there is no independent monitoring of any of these issues and I would like this inadequacy to be addressed. I would also appreciate a response to my concerns as they are the same as just about everyone I know around this area. We already have so many reasons to flee California with the drought, fire and tax issues, and we don't need another reason to leave.

Sincerely



Holly Ahrens



Ind 291-1

**INDIVIDUAL LETTER 291: HOLLY AHRENS**

---

**Response to Comment Ind 291-1**

Please see Response to Comment Ind 290-1.



**Individual Letter 292**

**From:** Hunter Jones <hunterdjones1@gmail.com>  
**Sent:** Monday, April 4, 2022 3:55 PM  
**To:** Idaho MMEIR  
**Subject:** DEIR - letter of opposition to proposed mine

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Dear Mr. Kelley,

This letter is to add my own opposition to the proposed Idaho Maryland Mine.

**Ind 292-1**

I grew up in Nevada County and have benefitted from it in nearly every way imaginable, through its environment, culture, and the prosperous business community, which has allowed for me to build a life here.

Many have brought up the many flaws in the DEIR, from flawed data and projections, to glaring omissions, and tremendous flaws portrayed as minor hurdles.

All of these are important and valid, but I would like to suggest that there are some broader issues at play here. To cite a cliché, Rise Gold has no stake in Nevada County. Their stake is in Nevada County's resources, which they will exploit at our expense, and then they will leave.

Unfortunately, if we cannot look to Hirschman's Pond, Malakoff Diggins, or other toxic, mercury-laden sites and see them for what they are, and learn from their history, we are doomed to repeat it. Our environment, locally and globally, is tenuous. To suggest that mining is part of our legacy is as enlightened as suggesting that slavery is a fundamental American value. It is a part of our history. We have to reckon with the damages of the past, and fight to not repeat those mistakes.

**Ind 292-2**

Likewise, our community cannot withstand an additional influx of traffic and commotion. The few jobs that will be created will mostly not be given to locals. Those that are given to locals will be fewer. They will tell you anything you need to hear, and when they fail to deliver, they will apologise and move on. A corporation cannot be held to account. They only exist to make money, and they will do everything in their power to succeed.

Furthermore, much has been said about tax benefits and tangential or serendipitous consequences to local business as a result of the few jobs that will be created. All of this implies that our county is desperate for funds. This is simply not the case.

**Ind 292-3**

We are not desperate. We don't need to bet everything on remote potentialities. Allowing Rise Gold, a company with no accolades, not history beyond bankruptcy, and no stake in our region to come in and exploit this area is cowardly and blatantly ignorant, given the history we all know.

Please do not force our county to endure another mining project when we don't need it, don't stand to benefit from it, and when we are still recovering from the last iteration of this practice.

Thank you very much for taking the time to read and consider my letter of opposition to the proposed mine.



Sincerely,  
Hunter Jones  
15588 Airport Road  
Nevada City  
530-205-7714

Ind 292-4





## **INDIVIDUAL LETTER 292: HUNTER JONES**

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### **Response to Comment Ind 292-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 292-2**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 292-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 292-4**

The referenced book does not address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decisionmakers for their consideration.



**Individual Letter 293**

April 3rd, 2022

To: Members of the Nevada County Planning Commission,  
Nevada County Board of Supervisors,  
and Nevada County Planning Department Staff  
Attn: Matt Kelley, Senior Planner  
950 Maidu Ave, Suite 170  
Nevada City, CA 95959  
Ph: 530 265-1423  
[matt.kelley@co.nevada.ca.us](mailto:matt.kelley@co.nevada.ca.us)

**To All Concerned:**

**Comments on Heavy Metals toxicity and Centennial Site**

Inge Ivens, Ph.D., retired member of the American Board of Toxicology

I have provided 2 comments below specific to inadequacies in the draft environmental impact report. I am expressing my own opinion and use my expertise as a trained biologist and toxicologist. I am a resident of Nevada City as of 2019 (10863 Willow Valley Road)

I have a masters degree in Zoology and Plant Physiology and a Ph.D. in Neurobiology. In addition I have many years of training and experience in various areas of Toxicology, which include evaluating the impact of mercury compounds on human health.

Thank you for the opportunity to comment on the draft environmental impact report for the Idaho-Maryland Mine Project (SCH# 2020070378).

Generally, I am of the opinion that the Rise Gold mining proposal will destroy the recognition of Grass Valley and Nevada City as tourist designations. Even "modern" gold mining is not a clean industry compared to tourism. Both cities and the surrounding Sierra Foothills are still addressing the environmental impact of old mining operations from more than 100 years ago and creeks and streams are contaminated with heavy metals.

I hope that the Planning Commission has our future not the past in mind and will not get blinded by shiny gold and brochures.

**Comment 1**

**Issue identified**

The long-term impact of accumulation and release of Arsenic from the mine operations is of concern since Arsenic compounds are human carcinogens and aquatic toxins. The draft environmental impact report (DEIR) does not take the long-term impact of released Arsenic and other toxic metals into account.

Ind 293-1

Ind 293-2



Ind 293-3

The number of current samples and the data on Arsenic levels in current mine water, as well as levels of Arsenic in existing rock and tailings at the Brunswick site are insufficient. For example page 590 and Figure 4.7-1 of the DEIR discusses elevated levels of Arsenic at one part of the Brunswick site. The report says “the material beneath this southeastern paved area was likely imported to the site and did not originate from mining operations at the Brunswick Mine Shaft”. This is speculation and more areas of the site need to be assessed for toxic metals including Arsenic compounds.

As known from local history, high Arsenic concentrations are associated with nearby mining sites.

**Action needed**

- Figure 4.7-1 of the DEIR indicates that less than half of the Brunswick site was sampled for toxic metals. Comprehensive data on Arsenic levels and levels of other toxic metals for example Mercury (Hg) in soil and rock of the entire Brunswick site are needed to conduct a risk assessment.
- There needs to be concurrent measurements in place to evaluate As and other potential contaminants in mine tailings and the industrial fill proposed to be deposited at the Brunswick and Centennial sites.
- As and other contaminant levels should be determined in rock/engineered fill before it is used as building material.

**Background**

Arsenic is commonly a contaminant of concern in lode Au mine waste, including waste rock and mill tailings.

Arsenic compounds are carcinogenic and also have other toxicities. The **International Agency for Research on Cancer (IARC)**, the **US National Toxicology Program (NTP)** and the **US Environmental Protection Agency (EPA)** list Arsenic as human carcinogen. For more detailed information, see the IARC monograph [Arsenic and Arsenic Compounds](#). The EPA classifies inorganic arsenic as a “human carcinogen,” based on evidence in human studies of links to lung, bladder, kidney, skin, and liver cancers.

The Arsenic concentrations in arsenian pyrite in waste-rock samples from Empire State Mine Historic Park ranged from <0.04 to 5.1 wt%, with a median value of 0.51 wt% based on more than 500 EMPA observations (Reference 1).

At the Lava Cap Mine in Grass Valley (current superfund site) mine waste, ore, and contaminated sediments had average As concentrations in the range of 500 – 1500 mg kg<sup>-1</sup> (= 0.5 – 1.5 wt%) (Reference 2).



Ind 293-4

The EPA limits the maximum level of arsenic allowed in US drinking water to 10 micrograms per liter ( $\mu\text{g/L}$ ), or 10 parts per billion (ppb). Further the EPA has set limits on the amount of arsenic that industrial sources can release into the environment.

**Relevant References to Draft Environmental Impact Report (DEIR)**

- Page 34, 4<sup>th</sup> bullet (Centennial site): “ Extensive site investigation, overseen by DTSC, has identified mill tailings, waste rock and affected soil at the site that contain lead, arsenic, mercury and other metals at concentrations exceeding background soil metals concentrations and regulatory benchmark concentrations. Elevated soil metals concentrations present a potential human health risk resulting from routine, long-term exposures, as well as ecological concerns in terms of impacts to plant and animal species.”
- Table 2-1 (points 4.7-2; 4.8-1)
- Pages 534, 586, 588, 590

**Comment 2**

**Issue identified**

The DEIR misses to address the hazardous conditions of the Centennial site and respective actions and their cleanup. Hazardous levels of As (see above), lead, nickel, cyanide (free), nickel and mercury are present in the soil of the Centennial site. There is currently no proposed plan nor money for the cleanup of this site that shows how this can be done safely (*Note: post-project Superfund cleanup of nearby Lava Cap has cost more than one million dollars per year so far for the past decade. Centennial cleanup would likely be similar in expense (cost estimates come directly from EPA)*).

**Action needed**

The DEIR needs to address the cleanup of the Centennial site before being used by Rise Gold.

**Background**

The Centennial site ranked 1st as the top priority abandoned mine sites by the EPA, because of the proximity to Grass Valley and also because of the known contamination and physical hazards that are on site.

Its Superfund designation has been conditionally deferred for the time being because Rise Gold signed a contract with the California Department of toxic substance controls to clean up the site. This has to happen before any gold mining operation can start (*Reference 3*). More recent reports from the DTSC determined that lead, arsenic, nickel, cyanide (free), nickel and mercury are present at hazardous levels. Contaminated tailings cover roughly 2/3 of the 56.4 acres with depths ranging from 2 to 20 feet at the Centennial site.

**References**

1 Burlak, T.L. 2012. *The mineralogical fate of arsenic during weathering of sulfides in gold-quartz veins: a microbeam analytical study*. MSc thesis, California State University, Sacramento,



<https://www.yumpu.com/en/document/view/16475309/the-mineralogical-fate-of-arsenic-during-weathering>

<sup>2</sup> Foster & Ashley 2002; Foster et al. 2011, see *Arsenic and mercury contamination related to historical gold mining in the Sierra Nevada, California*; Charles N. Alpers. 2017 *US Geological Survey*. Published by The Geological Society of London for GSL and AAG.

<sup>3</sup> Minewatch 2021; Yubanet 2020; <https://yubanet.com/regional/facing-epa-superfund-designation-rise-gold-compelled-to-cleanup-existing-idaho-maryland-mine-tailings>





## **INDIVIDUAL LETTER 293: INGE IVENS**

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### **Response to Comment Ind 293-1**

This is an introductory comment, expressing general concerns. Please see Master Response 1 – Non-EIR/Administrative Issues. The commenter's specific comments are addressed in Responses to Comments Ind 293-2 through Ind 293-4.

### **Response to Comment Ind 293-2**

The commenter states the DEIR does not take the long-term impact of released arsenic and other toxic metals into account. Metal content in dust generated by all activities of the project were evaluated in the Health Risk Assessment. Please see Chapter 4.3 and Appendix E.1 of the DEIR. Please see also Master Response 20 – Conservatism used for Metals in Dust.

The commenter states that the number of current samples and data on arsenic levels in current mine water is insufficient. Water samples have been taken in the Brunswick shaft and from the mine drains along Idaho-Maryland Road. The water treatment plant is designed to treat arsenic, if necessary, and an NOA is required for the mine water discharge to ensure that the discharged water meets applicable water quality standards. Please see Master Response 35 – Discharge to South Fork Wolf Creek.

The commenter states that the number of samples for arsenic in existing rock and tailings at the Brunswick site is insufficient and that half of the Brunswick site was not sampled for toxic metals. The commenter believes that the source of the area of elevated arsenic on the Brunswick site, as stated by NV5, is speculative. Figure 4.7-1 of the DEIR shows sampling locations conducted by NV5 inside the estimated boundary of historic waste rock fill as delineated on the figure. Areas outside of the sampled area of the Brunswick site either would not be disturbed by the project or are not potentially contaminated with historic mine waste rock. Therefore, the sampling of these areas of the Brunswick site is not necessary. As discussed on page 15 of the Phase I-II ESA, the mine waste rock reportedly originated primarily from the New Brunswick Mine portion of the Idaho-Maryland Mine, which is known to have low arsenic concentrations, and also from the Empire Mine, which is known to contain elevated arsenic concentrations (see page 15 of Appendix J of the DEIR). As discussed on page 38 of the ESA, the mixed soil and rock fill beneath the southeastern paved area contain total and soluble arsenic concentrations that exceed regulatory benchmarks. Based on the higher arsenic concentrations and anomalous acid Based Accounting (ABA) results for this material, the geotextile fabric incorporated into the fill, and historical aerial photographs that suggest the grading was performed after mining operations were suspended, the material was likely imported to the site and did not originate from mining operations at the New Brunswick Shaft. As such, the DEIR's conclusion is based on evidence, not on mere speculation.

The commenter states that high concentrations of arsenic are associated with nearby mining sites. However, the Idaho-Maryland Mine is a different gold deposit and hosted in different rock types than the Empire-Northstar and Lava Cap Mines. Arsenic levels from samples taken in various rock types at the Idaho-Maryland Mine Project are low. (see Section 4.4 of Appendix K.2 of the DEIR.)

The commenter states that there needs to be concurrent measurements to evaluate metals in engineered fill proposed to be placed at the Brunswick and Centennial sites and that metals content should be determined before it is used as building material. A WDR is required prior to placement of engineered fill. Please see Master Response 8 – Mine Waste Characterization, and Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets.



### **Response to Comment Ind 293-3**

The commenter explains the toxicity of arsenic and cites arsenic concentrations from the Empire State Mine and the Lava Cap Mine. However, the Idaho-Maryland Mine is a different gold deposit and hosted in different rock types than the Empire-Northstar and Lava Cap Mines. Arsenic levels from samples taken in various rock types at the Idaho-Maryland Mine Project are low. Please see Section 4.4 of Appendix K.2 of the DEIR.

Metal content in dust generated by all activities of the project were evaluated in the Health Risk Assessment for the DEIR. Please see also Master Response 20 – Conservatism used for Metals in Dust.

The commenter also cites the EPA standards for arsenic levels in drinking water. The MCL for arsenic in water is noted and is discussed in the DEIR and in Appendix K.2 of the DEIR. (see DEIR, p. 4.8-21.)

### **Response to Comment Ind 293-4**

As discussed in the DEIR, the Project Applicant has entered into a Voluntary Cleanup Agreement with the California Department of Toxic Substances Control (DTSC) for the voluntary cleanup of soil contamination on Centennial Industrial Site. A Remedial Action Plan (RAP) has been prepared and is under review by DTSC. The DTSC project is a separate project from the Idaho-Maryland Mine Project, is not under the authority of the County, and is subject to its own separate CEQA review. As such, the cleanup project is not the proper subject of the DEIR. Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

The Centennial site is not designated, nor under consideration to be listed, as a “superfund site” by the US EPA. The estimated total capital cost for clean-up of the Centennial site is estimated in the RAP at \$3 million (see page 53 of the Draft Final RAP).

The proposed project would likely produce mine waste with lower sulfide and metal content than those produced historically, and the historic mine waste has been determined to be Group C mining waste from which any discharge would be in compliance with the applicable water quality control plan, including water quality objectives other than turbidity. Please see Master Response 9 – Historical Mine Waste at Centennial Site.



**Individual Letter 294**

**From:** [Irene Frazier](#)  
**To:** [hokofsupervisors](#)  
**Subject:** Proposed Mine  
**Date:** Wednesday, February 16, 2022 3:45:00 PM

Dist 3

**CAUTION:** This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Board of Supervisors,

Please add my voice to those who oppose the Rise Gold Mine development. I have numerous concerns about this project and its impact, both on the environment and on our current economic strengths.

We are a small community that values our tourism, light industry and tech businesses. As our housing market shows, people are flocking to Nevada County to work remotely, and our environment is paramount in attracting these new people. (Broadband would attract even more!) While we have a rich mining history, it no longer fits with our current culture. Since those early days, homes have sprung up around the county that would be affected by any mining operation. What other industry would be allowed to threaten clean ground water or create toxic runoff?

We are so lucky to have such a beautiful county. Please help us keep it that way.

Thank you for your service.

Sincerely,

Irene Frazier (40 year resident)

Grass Valley, CA

**Ind 294-1**



## **INDIVIDUAL LETTER 294: IRENE FRAZIER**

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### **Response to Comment Ind 294-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 295**

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APR 01 2022

Community Development  
Agency

Matt Kelley  
Senior Planner, Nevada County Planning Department  
950 Maidu Avenue Suite 170  
Nevada City, CA 95959-7902  
or in email [Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

Itara O'Connell  
19960 Sunshine Charlie Dr.  
Grass Valley, CA 95945  
to.itara@gmail.com

March 28, 2022

Matt Kelley  
Senior Planner, Nevada County Planning Department  
950 Maidu Avenue Suite 170  
Nevada City, CA 95959-7902



RE: Draft Environmental Impact

**Ind 295-1**

The first section of the DEIR should reflect the reliability of the company's ability to follow rules. We know this CEO is either ignorant or lying when he says, "There will be no environmental impact from the mine." Also he does not have a good track record. How can we put our community at risk?

**Ind 295-2**

The Centennial Site: "The soil clean up activity would be completed before implementation of the project related activities at the Centennial Site, removing contaminated surface soils, contaminated trees, and other vegetation on a large portion of the property & creating an elevated pad area where the consolidated soil would be collected and capped."

**Ind 295-3**

4.7-4 Impair implementation of or physically interfere with an adopted emergency evacuation plan. The DEIR says "Less than significant" I'd like clarification on why this wouldn't be significant given that Brunswick is one of the few evacuation corridors and evacuating over 600 people on to one of the few evacuation corridors seems significant to me. How will this evacuation occur?

**Ind 295-4**

4.5-4 Cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 as either a site, feature, place cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native Tribe.

I did not see an interview with the Nisenan Tribe as to how they ascertained that this was insignificant. An interview with the tribal leaders should be included in the





- ↑  
DEIR. In 1849 the Nisenan Tribe was nearly exterminated during that gold rush. The mine is in fact on stolen land.
- Ind 295-5** 4.9-1 Physically divide an established community. This is considered "Less than significant." A major industry with an insurmountable number of risks will surely divide this community from our quaint tourist town to a major divide between the tourist section and the polluted industrial section. (If it's not polluted, why are the tires washed when leaving the site?)
- Ind 295-6** 4.12-6 The project applicant shall obtain an encroachment permit from Nevada County to install a "Slow trucks" sign on the road. The sign should face the industry and read- "cars on the road, trucks use caution before entering."
- Ind 295-7** 4.1 "That a project is visually inconsistent with the surrounding community"  
1. Buildings 165' tall are inconsistent with the rural/neighborhood setting setting.  
2. Trucks entering the highway 16 hrs a day for eighty years are visually inconsistent with our beautiful community.  
3. Lights on at night will be visually inconsistent with the night sky in our rural area.
- Ind 295-8** 4. The Centennial Site: "The soil clean up activity would be completed before implementation of the project related activities at the Centennial Site, removing contaminated surface soils, contaminated trees, and other vegetation on a large portion of the property & creating an elevated pad area where the consolidated soil would be collected and capped." This will be ugly, and will visually not fit in to the surrounding community.

Sincerely  
Ivan O'Connell



## **INDIVIDUAL LETTER 295: ITARA O'CONNELL**

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### **Response to Comment Ind 295-1**

The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 3 – Owner Responsibility.

### **Response to Comment Ind 295-2**

The comment restates a sentence in the DEIR regarding the Centennial Site, but provides no context which would allow a response.

### **Response to Comment Ind 295-3**

Please see Master Response 5 – Evacuation Zones.

### **Response to Comment Ind 295-4**

Please see Chapter 4.5, Cultural and Tribal Cultural Resources, and, specifically, the following excerpt from page 4.5-21 of the DEIR:

[...] InContext contacted the NAHC on September 10, 2019 to request a search of the Sacred Lands File for tribal cultural resources within or near the project area. The results of the Sacred Lands File search were negative, which indicates that known cultural resources do not exist on the project site.<sup>5</sup> In addition, InContext contacted each of the following Native American tribes with the potential to have knowledge of cultural resources in the project area:

- Colfax-Todds Valley Consolidated Tribe;
- Tsi Akim Maidu;
- United Auburn Indian Community of the Auburn Rancheria (UAIC); and
- Nevada City Rancheria Nisenan Tribe.

In an effort to gather data regarding cultural resources of importance to these entities that could be affected by the project, the above parties were contacted via regular mail, email, and telephone between September 16, 2019 and December 16, 2020. Responses were not received from any of the above tribes.

On November 25, 2019, Nevada County sent project notification letters with offers to consult pursuant to AB 52 to the Tsi Akim Maidu Tribal Council, Shingle Springs Band of Miwok Indians, Nevada City Rancheria Nisenan Tribe, and UAIC. The Tsi Akim Maidu Tribal Council, Shingle Springs Band of Miwok Indians, and Nevada City Rancheria Nisenan Tribe did not respond within the 30-day consultation period. The UAIC responded on December 18, 2019, and requested consultation and copies of the Cultural Impact Report, technical reports, requests for and results of records searches, and Geographic Information System (GIS) Shapefiles. The County provided such information. In addition, the UAIC noted that they are not aware of any Native American archaeological sites in or near the project site.

As presented above, consistent with CEQA Guidelines and Assembly Bill 52, as part of the DEIR process, local tribes were notified and invited to consult on the proposed project, and such information was presented in the DEIR.



### **Response to Comment Ind 295-5**

A project risks dividing an established community if the project would introduce infrastructure or alter land uses so as to change the land use conditions in the surrounding community, or isolate an existing land use. As discussed under Impact 4.9-1, the proposed project would operate on land designated for industrial use and currently used to store industrial materials on both the Brunswick and Centennial Industrial Sites. The project would not affect access to the nearby roadways and would not change access to a nearby community from these roadways. Therefore, the proposed project would not physically divide an established community.

### **Response to Comment Ind 295-6**

The comment expresses a general opinion that Mitigation Measure 4.12-6(e) shall be revised such that the sign installed would face the industry and, “cars on the road, trucks use caution before entering.” The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 295-7**

Long-term changes in visual character associated with the proposed project were discussed in Chapter 4.1, Aesthetics, of the DEIR. As noted therein, given the proposed heights of the structures and the permanent alteration of the views, the impact would remain significant and unavoidable. According to CEQA Guidelines Section 15093, if the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." As such, the County would be required to adopt a Statement of Overriding Considerations to address the aforementioned significant and unavoidable impact.

Impacts related to light and glare were addressed in Impact 4.1-3 within Chapter 4.1, Aesthetics, of the DEIR. As discussed therein, light spillover is not projected to occur off-site. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency, in deciding whether to approve the project.

### **Response to Comment Ind 295-8**

The DEIR concludes that impacts to visual character of the site would be significant and unavoidable. In addition, please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.



**Individual Letter 296**

TO: US Department of Interior, [Bureau of Safety and Environmental Enforcement](#)  
Nevada County, CA [Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

RE: A proposed project in Nevada County, CA, to re-open a mining operation, named the "Idaho-Maryland Mine Project. (IMMP)"

OBJECTIVE: Submitting a comment to Nevada Coty and reporting an instance of intended, inappropriate land-use to state- and federal authorities.

PROJECT SUMMARY

**Ind 296-1**

The project involves the re-opening of a mining operation in Nevada County, CA, near Grass Valley, CA. It promises moderate impact on the environment and substantial benefit to the local economy. However, massive quantities of surface water are to be utilized, there will be substantial pollution from dust and smog, and great amounts of mining gravel must be disposed of.

DISCUSSION

**Ind 296-2**

From the Environmental Impact Report Draft:

"Six impacts in this category are listed as either "less than significant," or "less than cumulatively considerable" prior to mitigation, with no mitigation measures required, while another — the generation of greenhouse gas emissions that may have a significant impact on the environment — is listed as "cumulatively considerable" prior to listed mitigation measures and "less than cumulatively considerable" afterward."

<https://www.theunion.com/news/report-delves-into-idaho-maryland-mine-project/>

In a time in which natural resources are swiftly depleting due to human activity, in which yard-thick trees are snapping like tooth picks in the wind due to air quality issues, dry climate, and subsequent parasite infestation, an "Environmental Impact Study" ought to entail somewhat more than a utility to push for the venture's ultimate approval.

Arguments like "economic growth" belong to an era which has ended some time ago. If one raises his head and looks beyond the luring local kudos such a project might bring to the area, and considers the global ramifications of what is being planned, he/she is bound to realize that there exists no need for any more economic growth, for further population influx, and foremost of all, no need for MORE GOLD!

About Gold:

The United States possesses some 8,000 metric tons of raw gold, which lays uselessly in its bunkers. <https://tradingeconomics.com/country-list/gold-reserves>. The proprietors of the IMMP might sooth their desires by utilizing their funds to purchase some of it.





Ind 296-3

Via its replacement with inferior metals, later with celluloses, and finally with nothing more than electronic data, gold's function of serving as primary currency has long ended and it further on provides no essential value to humans.

Project Evaluation:

Proper project evaluation starts with determining the proposal's feasibility and merit. Although the IMMMP might well be practicable (it primarily takes logistical efforts; no extraordinary managerial skill or leadership are required to re-initiate a previously abandoned endeavor), it features absolutely no merit. The pursuit of a fictitious value bares no necessity the local community or the environment.

A business project preposition ought to come about upon verifiable, local need for the venture's intended product. Proposing to restart a venture within an industry segment whose prior stint's rubbish is still corrodingly littering Grass Valley's surrounding forests, is simply childish – Cleaning up one game prior to beginning another, is taught in preschool.

Indirect Merits / Pre-existing Environmental Conditions:

The aspect of providing employment to local resident, swiftly loses momentum when one considers that the global human population is growing at a rate of 100 Million per annum, along with it all the waste and pollution that humans produce. A sincere political leader's prospective should thereupon shift from providing for a growing population, to CONTROLLING ITS HEAD COUNT!

It is no longer an idealistic "tree-hugger" standpoint to earnestly consider one's very own actions in respect to environmental impacts. Since the past several decades, human activity has pushed the global biosphere's integrity to the brink of collapse. Thereupon it becomes obvious that the planet does not need any more symbolism, technology, industry, or humans! And ironically, not even human civilization can utilize any more of these "commodities." What civilization needs to recover from this self-created misery, is *sophistication* instead of quantitative growth. Granted, mankind has come forth with some brilliant scientists, engineers, and architects; Nevertheless, if they keep using their talents against Nature, their cumulative IQ remains somewhere below that of a maggot or a blob of chicken snot.

Ind 296-4

Due to extensive drought conditions, the local flora is severely dry, surface water scarce, and the summers are getting hotter each year. This is due to air and water pollution generating a greenhouse effect, and mining-, quarrying-, agricultural-, and deforestation activities damaging the Earth's protective layers. Thereupon moisture cannot be retained in the soil. Furthermore, the petrochemical industry's practice of depriving the planet of its oil, makes the Earth crust rigid, which enhances the effect of ever hotter summers and increasingly colder winters. As long as civilization stubbornly refuses to initiate effective countermeasures, the trend WILL REMAIN worsening.

These aspects alone should suffice to preemptively preclude the IMMMP from commencing.





CONCLUSION

The Pursuit of Fictitious Values:

It is a caustic fact that precisely the human quality of possessing advanced intellect, which is proclaimed to raise them above all other animals on the planet, also generates their propensity to succumb to the lure of fictitious values. They then pursue these values with such vigor and commitment that they mindlessly compromise their very own and only planet and habitat. Such behavior, by any measure, constitutes a substantial psychiatric condition.

Formal Complaint and Recommendations:

The fundamental problem here lies with the fact that in midst numerous conditions of critical state, there still exist entities who have nothing on their mind than serving their own playfulness. They conveniently hide behind the "limited liability" curtain of corporations and the dubious achievement that these corporations possess full rights as persons before the law. Although these "persons" can be sued and prosecuted, it is obviously impossible to incarcerate a corporation; financial fines costing them a mere giggle. What can be done however, is to subject them to a psychological evaluation.

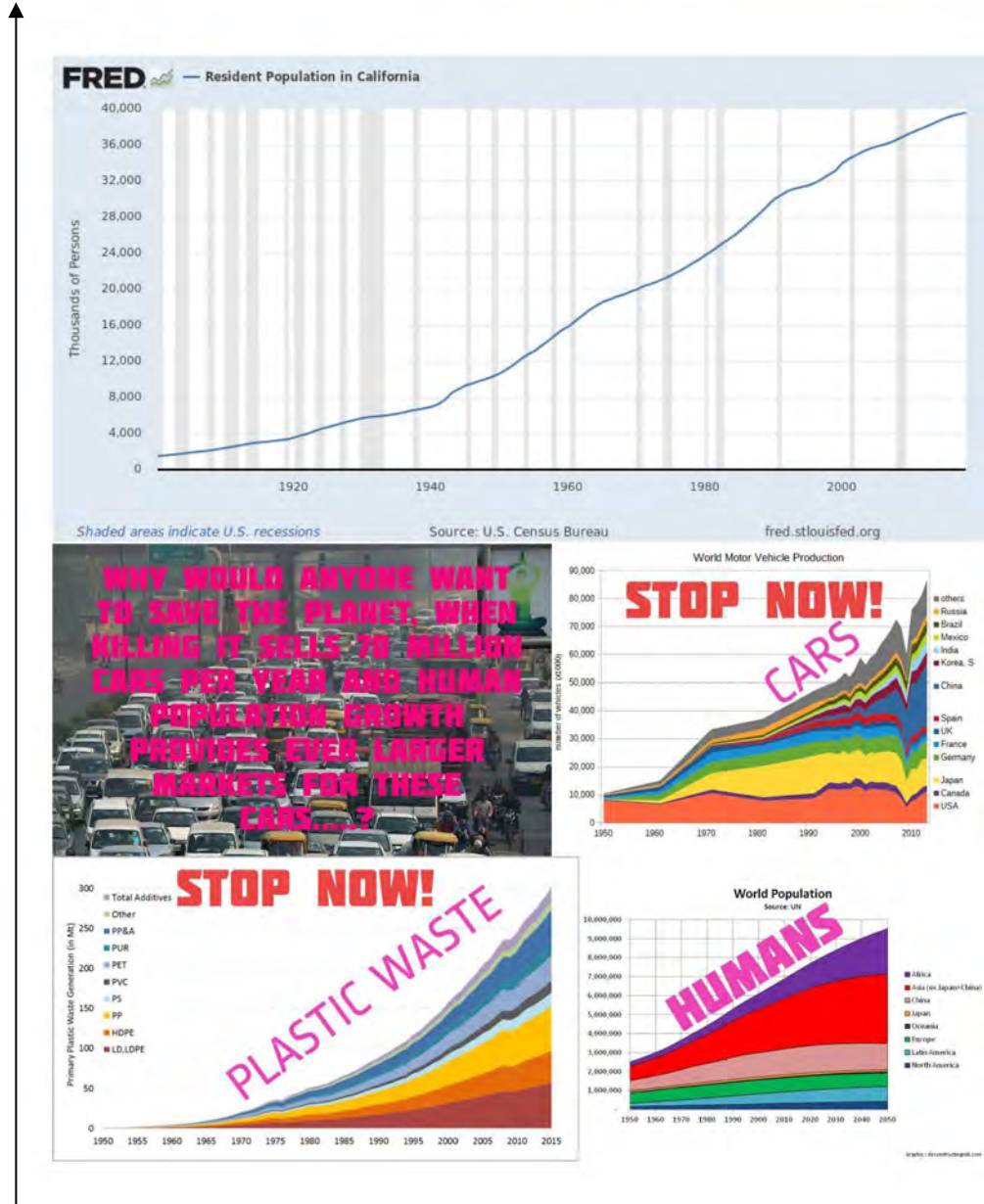
Psychology possess the ability analyze an entity's character without needing access to the physical person. Anything from documents and letter composed, over actions taken and behaviors displayed, to buildings, gear, and artwork constructed, can be utilized to establish somebody's personality, so why not a corporation's? Subsequent diagnoses can range from minor psychological disorders to criminal insanity. Thereupon a court may easily impose restrictions to the entity's ability to conduct business, engage in politics, and otherwise interact with society and the environment.

What is left to mention, is the county personnel's acute inability to professionally analyze a proposal's viability, and their thorough incompetence to mindfully consider the condition and state of affairs of the land entrusted to their care. Instead they display a strong propensity to collaborate with ill-minded, potentially criminal elements.

*Today, we live in a world that steadily inches towards the abyss. We can either let humans have it their way for as long as they can make the planet last, or we can stop them from having it their way, and make the planet last!*

Sincerely, J.T. Mayr, Friday, Grass Valley, CA, January 14, 2022





## **INDIVIDUAL LETTER 296: J.T. MAYR**

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### **Response to Comment Ind 296-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 296-2**

The comment does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 296-3**

The comment does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Responses and 3.

### **Response to Comment Ind 296-4**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**From:** sepmayr@yahoo.com  
**Sent:** Friday, February 18, 2022 1:25 PM  
**To:** wroller@theunion.com; karla.marshall@bsee.gov; Idaho MMEIR; Josef Mayr Mayr  
**Subject:** The Union, February 18, 2022, "Community Conversation,"

**Individual Letter 297**

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**TO:** William Roller, [wroller@theunion.com](mailto:wroller@theunion.com)  
US Department of Interior, [Bureau of Safety and Environmental Enforcement](#)  
Nevada County, CA [Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

**RE:** The Union, February 18, 2022, "Community Conversation,"

Ind 297-1

In addition to my previous arguments, and in response to THE UNION's article, I hereby point out that "economic" growth" might well have been the "call of the day" some decades, or even centuries ago; Today, however, we face severe problems of ecological and sociological nature, resulting from over-population and restless industrial expansion. If humans are to prevail as a species on this planet, we must revert to a respectful treatment of all our Mother Earth. This does not mean that we ought to climb back up the trees and throw bananas at each other, no, it merely entails that now is the time to relax a few notches and enjoy the fruits of our past achievements. This includes measures towards population reduction, ceasing of harmful, industrial activities, streamlining of production methods and product lines of essential items, and, foremost of all, focusing on SUSTAINABILITY AND SOCIOLOGICAL SOPHISTICATION.

Just because some project proves to be "reasonable and achievable," and that it claims to have invested millions of dollars into its environmental review, does not supply it with MERIT. And creating jobs that produce something unimportant as gold, propels us straight back to old Egypt and its pyramid builders: There is no more need for such "economic slavery." The need and beneficence of our current profit-based economy model is also outdated. As it is based on the illusion of infinite growth in a finite space, it inevitably was bound to reach its limits.

That humans need to work in order to obtain money to purchase their food is also a mere hallucination. Food comes from Nature, not from the supermarket or candy factory. And if one possesses the capacity of rational thought, he/she will realize that it is each creature's inalienable prerogative to seek food and pursue maturation. Humans have violated this universal law by enslaving animals and each other to lift a small, self-proclaimed elite. They





thereby arranged for a situation in which wild (or free) animals comprise merely 4% of all living creatures on the planet; a whopping 60% are occupied by life stock, and the rest? Humans!

To counteract these shocking facts dictates the mission of the day: Reduce and re-naturalize.

Sincerely, J. T. Mayr, Friday, February 18, 2022

Please find below my original contribution, submitted to Nevada County earlier this month.

TO: US Department of Interior, [Bureau of Safety and Environmental Enforcement](#)  
Nevada County, CA [Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

RE: A proposed project in Nevada County, CA, to re-open a mining operation, named the "Idaho-Maryland Mine Project. (IMMP)"

OBJECTIVE: Submitting a comment to Nevada Coty and reporting an instance of intended, inappropriate land-use to state- and federal authorities.

#### PROJECT SUMMARY

The project involves the re-opening of a mining operation in Nevada County, CA, near Grass Valley, CA. It promises moderate impact on the environment and substantial benefit to the local economy. However, massive quantities of surface water are to be utilized, there will be substantial pollution from dust and smog, and great amounts of mining gravel must be disposed of.

#### DISCUSSION

From the Environmental Impact Report Draft:

"Six impacts in this category are listed as either "less than significant," or "less than cumulatively considerable" prior to mitigation, with no mitigation measures required, while another — the generation of greenhouse gas emissions that may have a significant impact on the environment — is listed as "cumulatively considerable" prior to

Ind 297-2

Ind 297-3





listed mitigation measures and "less than cumulatively considerable" afterward."  
<https://www.theunion.com/news/report-delves-into-idaho-maryland-mine-project/>

In a time in which natural resources are swiftly depleting due to human activity, in which yard-thick trees are snapping like tooth picks in the wind due to air quality issues, dry climate, and subsequent parasite infestation, an "Environmental Impact Study" ought to entail somewhat more than a utility to push for the venture's ultimate approval. Arguments like "economic growth" belong to an era which has ended some time ago. If one raises his head and looks beyond the luring local kudos such a project might bring to the area, and considers the global ramifications of what is being planned, he/she is bound to realize that there exists no need for any more economic growth, for further population influx, and foremost of all, no need for MORE GOLD!

About Gold:

The United States possesses some 8,000 metric tons of raw gold, which lays uselessly in its bunkers. [Gold Reserves - Countries - List](#). The proprietors of the IMMP might sooth their desires by utilizing their funds to purchase some of it.

**Gold Reserves - Countries - List**

This page displays a table with actual values, consensus figures, forecasts, statistics and historical data charts.

Via its replacement with inferior metals, later with celluloses, and finally with nothing more than electronic data, gold's function of serving as primary currency has long ended and it further on provides no essential value to humans.

Project Evaluation:

Proper project evaluation starts with determining the proposal's feasibility and merit. Although the IMMP might well be practicable (it primarily takes logistical efforts; no extraordinary managerial skill or leadership are required to re-initiate a previously abandoned endeavor), it features absolutely no merit. The pursuit of a fictitious value bares no necessity the local community or the environment.

A business project preposition ought to come about upon verifiable, local need for the venture's intended product. Proposing to restart a venture within an industry segment whose prior stint's rubbish is still corrodingly littering Grass Valley's surrounding forests, is simply childish – Cleaning up one game prior to beginning another, is taught in preschool.

Indirect Merits / Pre-existing Environmental Conditions:

The aspect of providing employment to local resident, swiftly loses momentum when one considers that the global human population is growing at a rate of 100 Million per annum, along with it all the waste and pollution that humans produce. A sincere political

Ind 297-4

Ind 297-5



leader's prospective should thereupon shift from providing for a growing population, to CONTROLLING ITS HEAD COUNT!

It is no longer an idealistic "tree-hugger" standpoint to earnestly consider one's very own actions in respect to environmental impacts. Since the past several decades, human activity has pushed the global biosphere's integrity to the brink of collapse. Thereupon it becomes obvious that the planet does not need any more symbolism, technology, industry, or humans! And ironically, not even human civilization can utilize any more of these "commodities." What civilization needs to recover from this self-created misery, is *sophistication* instead of quantitative growth. Granted, mankind has come forth with some brilliant scientists, engineers, and architects; Nevertheless, if they keep using their talents against Nature, their cumulative IQ remains somewhere below that of a maggot or a blob of chicken snot.

Due to extensive drought conditions, the local flora is severely dry, surface water scarce, and the summers are getting hotter each year. This is due to air and water pollution generating a greenhouse effect, and mining-, quarrying-, agricultural-, and deforestation activities damaging the Earth's protective layers. Thereupon moisture cannot be retained in the soil. Furthermore, the petrochemical industry's practice of depriving the planet of its oil, makes the Earth crust rigid, which enhances the effect of ever hotter summers and increasingly colder winters. As long as civilization stubbornly refuses to initiate effective countermeasures, the trend WILL REMAIN worsening.

These aspects alone should suffice to preemptively preclude the IMMP from commencing.

#### The Pursuit of Fictitious Values:

It is a caustic fact that precisely the human quality of possessing advanced intellect, which is proclaimed to raise them above all other animals on the planet, also generates their propensity to succumb to the lure of fictitious values. They then pursue these values with such vigor and commitment that they mindlessly compromise their very own and only planet and habitat. Such behavior, by any measure, constitutes a substantial psychiatric condition.

#### CONCLUSION

#### Formal Complaint and Recommendations:

The fundamental problem here lies with the fact that in midst numerous conditions of critical state, there still exist entities who have nothing on their mind than serving their own playfulness. They conveniently hide behind the "limited liability" curtain of corporations and the dubious achievement that these corporations possess full rights as persons before the law. Although these "persons" can be sued and prosecuted, it is obviously impossible to incarcerate a corporation; financial fines costing them a mere giggle. What can be done however, is to subject them to a psychological evaluation.



Psychology possess the ability analyze an entity's character without needing access to the physical person. Anything from documents and letter composed, over actions taken and behaviors displayed, to buildings, gear, and artwork constructed, can be utilized to establish somebody's personality, so why not a corporation's? Subsequent diagnoses can range from minor psychological disorders to criminal insanity. Thereupon a court may easily impose restrictions to the entity's ability to conduct business, engage in politics, and otherwise interact with society and the environment.

What is left to mention, is the county personnel's acute inability to professionally analyze a proposal's viability, and their thorough incompetence to mindfully consider the condition and state of affairs of the land entrusted to their care. Instead they display a strong propensity to collaborate with ill-minded, potentially criminal elements.

*Today, we live in a world that steadily inches towards the abyss. We can either let humans have it their way for as long as they can make the planet last, or we can stop them from having it their way, and make the planet last!*

Sincerely, J.T. Mayr, Friday, Grass Valley, CA, January 14, 2022



## **INDIVIDUAL LETTER 297: J.T. MAYR**

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### **Response to Comment Ind 297-1**

The comment does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

### **Response to Comment Ind 297-2**

Please see Response to Comment Ind 296-1.

### **Response to Comment Ind 297-3**

Please see Response to Comment Ind 296-2.

### **Response to Comment Ind 297-4**

Please see Response to Comment Ind 296-3.

### **Response to Comment Ind 297-5**

Please see Response to Comment Ind 296-4.





Individual Letter 298

Dist 4

**I support re-opening the Idaho-Maryland Mine**

Nevada County has a tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 600 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also support additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

**MCRAE**  
14436 Sugar Loaf Road  
Grass Valley, Ca. 95949

\_\_\_\_\_  
ZIP \_\_\_\_\_  
\_\_\_\_\_

Email Address \_\_\_\_\_

*I do not support the mine*  
*J. McRae*

Ind 298-1

*Board of Supervisors,  
Please vote no on Re-opening the mine!*

*Respectfully,  
Jackie McRae*

**RECEIVED**  
FEB 24 2022  
NEVADA COUNTY  
BOARD OF SUPERVISORS





## **INDIVIDUAL LETTER 298: JACKIE MCRAE**

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### **Response to Comment Ind 298-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 299**

**From:** Jacqi Britton <jacqi.todd@gmail.com>  
**Sent:** Monday, April 4, 2022 11:51 AM  
**To:** Idaho MMEIR  
**Subject:** NO to the MINE! ATTN: Matt Kelley! Leave our Nature alone!

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**Do not click links or open attachments** unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

To whom it may concern,

WE DON'T WANT NO MINE ADDITION! We don't need no gold control! Hey ATTN: Matt Kelley! Leave our Nature alone!

I am a current resident and registered voter in Nevada County and I am in **OPPOSITION to THE MINE!**

If you have any questions, please feel free to write me back.

Thank you,  
Jacqi Britton

**Ind 299-1**



## **INDIVIDUAL LETTER 299: JACQI BRITTON**

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### **Response to Comment Ind 299-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 300**

**From:** [Jacqueline Finley](#)  
**To:** [BOC Public Comment](#)  
**Subject:** Rise Gold Mine  
**Date:** Tuesday, March 22, 2022 8:28:56 PM  
**Attachments:** [2022RiseGold.docx](#)

Dist 2

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**Do not click links or open attachments** unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Attached are my feelings about the Rise Gold Corporation's mine proposal.

Jacqueline Finley  
10901 Thornicroft Way  
GV 95949

530-274-8574



**Ind 300-1**

My Cornish great-great-grandfather arrived about 1850 in Grass Valley. After several years he built and worked a nineteen-acre gold mine several miles outside of town. This mine is still owned by his descendants, not by choice, but by the fact the land is so polluted with mercury and arsenic that it cannot be sold. It stands as a sad commentary on what happened in the past.

I excuse him and his contemporaries for not fully understanding the incredible damage gold mining does to a region. At the time the early mines were functioning, citizens were less concerned about long-term environmental effects, and more on providing financial security for themselves and their families.

Over the decades, however, we've learned how mining destroys the earth, not just here, but worldwide. Mining is a complicated and often unpredictable endeavor, even in 2022. To be productive it must be noisy and encompassing. While Rise Gold Corporation claims the environment won't be harmed, nor residents impacted by lines of loud trucks or water supply worries, history points otherwise.

Gold is not a life necessity, but a healthy, natural world and happy community should be. The people of this beautiful area have spoken. We do not want the Rise Gold Mine.





## **INDIVIDUAL LETTER 300: JACQUELINE FINLEY**

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### **Response to Comment Ind 300-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 301**

Jake Jacus  
District 1  
Grass Valley

Nevada County Planning Department

To Whom It May Concern,

I have several points of view regarding the mining situation. Number one, is the amount of noise and traffic on the roads that will be generated from the mine, it is completely unacceptable. Number two, is taking that much water from underground, and to do so during a drought and dredging up all the toxins that will come with it, is completely wrong. This will not only affect the environment; the streams, rivers, agriculture, air quality, and wildlife, but it will also directly affect citizens of Nevada County's personal underground wells. In my opinion, it will irrevocably change our way of life and change the serenity of this beautiful area we call home. As far as this company, Rise Gold, their past history alone should be enough to deem them unworthy to even work on this ill fated project. It should not be about one company's greed, it should be about preserving the quality of life that we have all come to love. I personally think their promise of boosting our economy is a sham, it will not bring jobs to our county, but will likely outsource jobs from elsewhere. The end effect being, lining the pockets within the company while negatively affecting our community. And who is to say that they will not just shut down the mine leaving behind a huge toxic dump with no plan to clean it up. I want to see my children and grandchildren to be able to grow up in a beautiful community and area that has so much to offer, without reopening a mine that has the potential to destroy everything we love about this area.

Sincerely,  
Local Citizen and Business Owner Since 1979

**Ind 301-1**



## **INDIVIDUAL LETTER 301: JAKE JACUS**

---

### **Response to Comment Ind 301-1**

The commenter expresses general concerns regarding the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 302

W

**IDAHO-MARYLAND MINE PROJECT  
DRAFT EIR COMMENT FORM**

To document the author of comments received, please provide the following information. Thank you.

Name: Jalana Smith

Address: 18690 Jones Ridge road, Grass Valley, CA 95945

Organization (if applicable): \_\_\_\_\_

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

**Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 95959-8617  
Idaho.MMEIR@co.nevada.ca.us**

Ind 302-1

I am a lifelong resident of Nevada County for 40 years. I have seen how mining in the past has negatively impacted the land, environment and community locally. This new mine will cause serious damage to our local environment and also the quality of life of the residents of Nevada County.

The damage from this mine WILL impact our community very negatively. This community has made it very clear that we do NOT want this mine. I see many negative effects, and no benefit to our community that would offset the negative outcome.

Please DO NOT allow this mine to come into our community.



## **INDIVIDUAL LETTER 302: JALANA SMITH**

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### **Response to Comment Ind 302-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 303**

**From:** [James Blimthorpe](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** Community Opinion  
**Date:** Wednesday, January 5, 2022 12:15:12 PM

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**Ind 303-1**

Obviously, the supervisors are trying to push through something that the people of Nevada County do NOT WANT.

The environmental report is probably tilted toward opening the mine and belittling all of the justifiable reasons against the mine.

Our community is solidly against this monstrosity of a mine. The supervisors should surely recognize the opinions of the residents here in Nevada County, rather than those of a corrupt corporation.

James Blimthorpe



## **INDIVIDUAL LETTER 303: JAMES BLIMTHORPE**

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### **Response to Comment Ind 303-1**

The commenter expresses general concerns regarding the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 304**

**From:** James Blimthorpe <blimthorpe@gmail.com>  
**Sent:** Tuesday, January 4, 2022 8:58 AM  
**To:** Idaho MMEIR  
**Subject:** No on mine

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**Ind 304-1**

The majority of people in this county are totally against this mining monstrosity. No matter what the fake EIR says, there is going to be corruption involved in the decision to go ahead with this project. Why is it not decided by the people of Nevada County ?

James Blimthorpe



## **INDIVIDUAL LETTER 304: JAMES BLIMTHORPE**

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### **Response to Comment Ind 304-1**

The commenter notes the EIR is fake, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 305**

**From:** [James Haufler](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** Idaho-Maryland Mine Project EIR  
**Date:** Saturday, January 8, 2022 2:29:45 PM

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Greetings:

I have a few questions:

- Ind 305-1**      1. Have any of the soil samples or rock samples, or cores been tested for radioactive elements such as uranium? If so, what were the results? If no such testing was done, why not?
- Ind 305-2**      2. Will Rise Grass Valley purchase a bond that will pay for reclamation/restoration of the sites affected by this project if Rise Grass Valley or their successors, or assigns permanently cease operations at the site for any reason including bankruptcy?
- Ind 305-3**      3. Is there any information that would support the idea that there will actually be a local or regional market for the sale of surplus engineered fill as construction aggregate or fill? If there is not such a market, how will Rise Grass Valley dispose of that material at their expense, and without any impact on Nevada County for waste management operations or expenses.

Thank you,

Jim

James Haufler  
3555 Arden Villa Court  
Roseville, CA 95747  
916-865-4721 (home)  
916-801-3669 (cell)





## **INDIVIDUAL LETTER 305: JAMES HAUFLE**

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### **Response to Comment Ind 305-1**

The commenter asks if the Project Applicant tested any of the rock/core samples for radioactive elements. Water sampling conducted for the project included radiological testing, including uranium, as shown in Table 3-6 of Appendix K.2 and all results are well below regulatory standards, as shown in the table. Uranium was not analyzed in rock samples because elevated uranium is not present in the rock types in the mine area. The commenter is referred to Response to Comment Grp 8-15.

### **Response to Comment Ind 305-2**

The commenter asks if the Project Applicant will purchase a bond for reclamation of the project site. A reclamation bond is required for the project. The commenter is referred to page 4.6-24 of the DEIR and Appendix C of the DEIR.

### **Response to Comment Ind 305-3**

The commenter asks if there is any information supporting the notion that engineered fill could be used for local or regional construction projects. The commenter is referred to Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets.



**Individual Letter 306**

**From:** James McMaster <jdmcmaster@hotmail.com>  
**Sent:** Monday, April 4, 2022 3:37 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** Rise Mine DEIR Comments

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**Ind 306-1**

I moved to the Union Hill area of grass Valley in June 2020 from the east bay of San Francisco looking for a better quality of life that includes: clean air, clean water, quiet surroundings, and lack of traffic congestion. The proposed Rise Mine violates all of those.

I am renting a house and would have purchased one in my neighborhood, which I love, except for the threat of the coming mine. Specific DEIR concerns are:

– The groundwater model has fundamental flaws in the initial start point and baseline data Sumption stashed all of which throw off the entire analysis.

**Ind 306-2**

– Dealing with mine waste – about asbestos will be a huge and expensive problem that requires far more comprehensive management than described in the report.

**Ind 306-3**

– Greenhouse gas emissions – the report excluded elements that would put the project over the arbitrary threshold limit, but recent climate change Cole says the threshold should be “net zero”.

**Ind 306-4**

– Cleanup of the toxic, pre-super fund Centennial site that would be used to dump mine waste is not included in the DEIR but is required by the California environmental quality act.

**Ind 306-5**

– Missing construction time estimates throw off the entire analysis of noise, traffic, and air.

**Ind 306-6**

– The DEIR incorrectly assesses nighttime noise and underestimates the noise of dumping main waste near established residential neighborhoods.

**Ind 306-7**

– Air traffic hazards anesthetic impacts need to be studied further due to the likelihood of a moisture cloud plume that could be created by warm saturated air ventilation.

**Ind 306-8**

– Blasting plans don't follow US mining guidelines that restrict blasting during evening hours.

**Ind 306-9**

– The plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant. In this time of scarce water in climate change do we really want to be dumping millions of gallons of water into the creek? I think not.

**Ind 306-10**

– Meteorological data used to assess the health risk of airborne pollutants doesn't fit grass Valley's profile or accurately reflect local conditions.

**Ind 306-11**

Please consider my concerns above and I am happy to talk with you in person. Please rule that the DEIR is inadequate in the mine should be stopped.

A couple of years ago I took a vacation through Butte Montana. At its peak there were over 3500 people working in the mine, today there are seven people. Those of the guys who operate the robots. As you look around there's no trees because acid rain has killed them off from the 1800s to today. Don't let grass Valley become a wasteland like Butte.

Sincerely,

James McMaster  
10845 Bartlett Dr.  
grass Valley CA 95945  
925.286.4958



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## **INDIVIDUAL LETTER 306: JAMES MCMASTER**

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### **Response to Comment Ind 306-1**

The commenter states that the groundwater model is flawed due to the initial start point and baseline data but provides no further information. The DEIR analyzed the project's impacts to groundwater in Chapter 4.8 (Hydrology and Water Quality) and found impacts to be less than significant after mitigation. The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model.

### **Response to Comment Ind 306-2**

The commenter states that the DEIR understates the degree to which asbestos emissions from the project will need to be managed but does not identify any inadequacies of the DEIR with regard to asbestos. The DEIR analyzed asbestos emissions in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and found the impacts to be less than significant after mitigation. The commenter is also referred to Master Response 18 – Air Quality Thresholds, Master Response 22 – Conservatism of Asbestos Assumptions, Master Response 23 – Adequacy of Asbestos Sampling, Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

### **Response to Comment Ind 306-3**

The commenter states that the DEIR excluded elements which puts the project's GHG emissions over an arbitrary threshold, but recent climate change goals purportedly require net zero GHG emissions. The commenter is referred to Master Response 27 – Greenhouse Gas Thresholds.

### **Response to Comment Ind 306-4**

The commenter states the DEIR improperly excludes the cleanup of the Centennial Industrial Site. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

### **Response to Comment Ind 306-5**

The commenter states that missing construction schedules skew the DEIR's analysis of the project's impacts. The commenter is referred to Master Response 24 – Project Construction Schedule.

### **Response to Comment Ind 306-6**

The commenter states that the DEIR incorrectly assesses nighttime noise and underestimates the noise impacts of dumping waste near residential neighborhoods but provides no further details or explains how the DEIR is inadequate. The DEIR analyzed noise impacts in Chapter 4.10 (Noise and Vibration) and found the noise impacts associated with engineered fill placement to be less than significant after mitigation (see Impact 4.10-2). Regarding nighttime noise, please see Response to Comment Grp 21-130.

### **Response to Comment Ind 306-7**

The commenter states that the DEIR must discuss air traffic hazards due to a potential moisture cloud plume. The commenter is referred to Response to Comment Grp 7-95.

### **Response to Comment Ind 306-8**

The commenter states the project does not adhere to federal mining guidelines regarding blasting. The commenter is referred to Response to Comment Grp 21-144.



**Response to Comment Ind 306-9**

The commenter states that the DEIR fails to demonstrate impacts to wildlife would be less than significant and is concerned about discharging water to South Fork Wolf Creek during a drought. The commenter does not provide any additional information to identify how the DEIR is inadequate with regard to wildlife impacts. The DEIR analyzed biological impacts in Chapter 4.4 (Biological Resources) and found the impacts to be less than significant after mitigation. The DEIR also analyzed the impacts to South Fork Wolf Creek in Chapter 4.8 (Hydrology and Water Quality) and found the impacts less than significant after mitigation. The commenter is also referred to Master Response 30 – Biological Study Technical Adequacy, Master Response 35 – Discharge to South Fork Wolf Creek, Master Response 36 – Flows in South Fork Wolf Creek and Master Response 16 – Drought and Climate Change.

**Response to Comment Ind 306-10**

The commenter states that the DEIR utilizes meteorological data in the health risk assessment that does not reflect local conditions. The commenter is referred to Master Response 17 – Meteorological Data Used in HRA.

**Response to Comment Ind 306-11**

The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.



**Individual Letter 307**

**From:** [James Mullen](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** Reopen Idaho Maryland mine?  
**Date:** Sunday, January 9, 2022 5:43:03 PM

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**Ind 307-1**

No way, no how

Sincerely, James p Mullen  
13420 Colfax Hwy grass valley ca 95945  
Sent from my iPad





## **INDIVIDUAL LETTER 307: JAMES MULLEN**

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### **Response to Comment Ind 307-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 308**

**From:** Jamie Legon <jamielegon@gmail.com>  
**Sent:** Saturday, April 2, 2022 10:04 AM  
**To:** Idaho MMEIR  
**Subject:** The Mine

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**Ind 308-1**

Opening the mine is the worst possible idea. The amount of water needed and expended is ENORMOUS. Doesn't anyone realize that we're in a DROUGHT!!! The amount of jobs created is pitifully small next to the amount of people/families impacted by the lower water table. The supposed "facts" the mine uses for justification are ludicrous, falsely stated and improperly studied. This idiot proposal shouldn't even be on the table...



## **INDIVIDUAL LETTER 308: JAMIE LEGON**

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### **Response to Comment Ind 308-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 309**

**From:** David Lore <dlore@santacruzcoe.org>  
**Sent:** Monday, April 4, 2022 12:57 PM  
**To:** Idaho MMEIR  
**Subject:** Reopening the mine

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Ind 309-1

Dear Mr Kelly,

Of my many concerns about the reopening of the gold mine at the Brunswick site, the top one is the amount of water required to run the mine and the discharge of waste water into our streams and soils. California is in the worst drought ever experienced, according to an 800 year study headed up by UCLA climate scientist Park Williams. Even without this disturbing new evidence, the fact that California is in a very serious drought is indisputable. Our Board of Supervisors must put our citizen's and environmental water needs first. Whatever amount of money the county may make cannot create more water.

I'm concerned how this proposal impacts wells in the area. The FEIR needs to analyze all the wells potentially impacted by the project. The impact analysis on wells in the DEIR is inadequate.

Please consider all the many serious impacts of re-opening the mine sent your way. This is a very serious decision that will affect our county for generations. Thank you.

Sincerely,

Jan K Todd  
14494 Lower Colfax Rd.  
Grass Valley, CA 95945

**Santa Cruz County Office of Education**  
[www.santacruzcoe.org](http://www.santacruzcoe.org)



## **INDIVIDUAL LETTER 309: JAN TODD**

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### **Response to Comment Ind 309-1**

Please see Master Responses 13 through 16 regarding groundwater, including drought and climate change. See also Master Response 35 - Discharge to South Fork Wolf Creek. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





Individual Letter 310

**DRAFT EIR COMMENTS - Proposed Idaho-Maryland Mine (DEIR)**

April 4, 2022 (Emailed, 4 pages)



Matt Kelley  
Senior Planner, Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902  
Phone: 530-265-1423  
Email: [Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

*Original Sent  
by Email on  
April 4, 2022  
La Page 6*

**GENERAL COMMENTS on the Proposal & DEIR:**

Ind 310-1

Having reviewed many Environmental Impact Reports as a Municipal Advisory Council (MAC) Member in a large California unincorporated area, I am very concerned about the proposed project and the general inadequacy of the draft Environmental Report that has been prepared. A DEIR with these problems likely will end up in litigation...

Ind 310-2

- **INADEQUATE ASSESSMENT of CUMULATIVE EFFECTS** on Water Quality and Water Use, Ground Water Availability and Quality, Air Quality, Traffic, Noise, Quality of Life...

Ind 310-3

- **INADEQUATE ASSESSMENT of MITIGATION RISKS...** What happens when the proposed project proponents FAIL to complete promised MITIGATIONS? What are the RISKS to the COMMUNITY?

Ind 310-4

- **INADEQUATE ASSESSMENT of RISKS & CUMULATIVE EFFECTS – FOREVER.** The 80-year time span of the proposed project, and the need to mitigate toxics affecting water, air, and quality of life issues will last forever... WILL the PROPOSED MITIGATIONS? Or, will they end with an early closing or failure of the proposed project? Then, who pays?

Ind 310-5

- **CONCLUSION:** This DEIR MUST BE REJECTED, UPDATED AND REVISED AND ADEQUATELY COMPLETED AND RECIRCULATED to the PUBLIC.



**DRAFT EIR COMMENTS - Proposed Idaho-Maryland Mine (DEIR).**

**MITIGATIONS:**

Ind 310-6

- The proposed project will take away the long-term groundwater / property rights and economic value of the hundreds of properties in the area of the proposed mine as a result of "dewatering."

Ind 310-7

- Proposed project Mitigations may become too expensive or fail, or both, leaving significant adverse consequences that are not mitigated. How does the DEIR assess the RISKS associated with potential mitigations?

Ind 310-8

- CUMULATIVE IMPACTS do NOT MATCH the proposed MITIGATIONS...

**For EXAMPLE, concerning WATER:**

Comments from NID Nevada Irrigation District General Manager Jennifer Hanson illustrates my concerns on the inadequacy of the DEIR with respect to a critical issue like WATER and WATER QUALITY, RISKS to the COMMUNITY from Rise Gold's proposal. Should Rise Gold fail and fall into bankruptcy, for business reasons or because of the cost of cleaning up environmental damage, the public, public agencies, likely will be faced with the ultimate clean up efforts and costs. How are these risks to Nevada County taxpayers mitigated?

Ind 310-9

"Hanson said Rise Gold Corp., the entity trying to reopen the mine, should purchase a bond worth around \$14 million to account for the assumptions and unknowns of hydrological modeling and the risk incurred to their neighbor's water supply."

"Hanson said the district serves over 700 irrigation customers, on top of purveying potable water to most of Nevada County, and requested that a water quality mitigation measure be included in the next EIR that would require daily monitoring and public availability to data regarding discharged water."

**For ADVERSE WATER IMPACTS alone, my professional position would be to recommend REJECTING the PROPOSED DRAFT EIR as well as the PROPOSED PROJECT!**



<b>DRAFT EIR COMMENTS - Proposed Idaho-Maryland Mine (DEIR).</b>	
<b>Ind 310-10</b>	<p><b>FOR EXAMPLE: Massive WATER FLOWS &amp; TOXICS drain into WOLF CREEK, the Bear &amp; Feather Rivers, &amp; eventually San Francisco Bay:</b></p> <p>Dewatering the proposed mine and daily pumping from the proposed mine would place millions of gallons of water into Wolf Creek. The water would include toxics. HOW MUCH of WHAT TYPES? While the DEIR proposes “cleaning” the water, before putting back into Wolf Creek (water that may be used for drinking water, for irrigation, for environmental needs on its way to San Francisco Bay...)</p>
<b>Ind 310-11</b>	<p>How will the proposed project pay for and guarantee that the mine “waste water” will not damage the downstream Wolf Creek? How will the firm pay for equipment failures or plant failures that place toxics into Wolf Creek? What is the firm’s proposed liability and what insurance are they providing Nevada County?</p>
<b>Ind 310-12</b>	<p>Again, the history of other “re-opened” mines in the area is not a stellar one.</p> <ul style="list-style-type: none"><li>▪ <b>The LAST PROPOSAL for REOPENING this MINE FAILED for the same reasons this proposal should not be approved after an ADEQUATE EIR is prepared, commented on by the public, and analyzed by the Nevada County Planning Commission and the Board of Supervisors: Idaho-Maryland Mine in the 2005-2012 timeframe: This proposed project failed to complete the Environmental Impact Report due to environmental concerns and financial problems. (Source: CEA) The DEIR SHOULD EXPLAIN HOW &amp; WHY THIS PROPOSAL &amp; MITIGATIONS HAVE CHANGED FROM THE LAST FAILED ATTEMPT TO REOPEN THE MINE?</b></li></ul>
<b>Ind 310-13</b>	<ul style="list-style-type: none"><li>▪ <b>The San Juan Mine (Siskon) opened and was forced to shut down in 1995 after a disastrous draining of local wells due to mining. The impacts of this failure are still felt amongst the residents. Wells were permanently damaged. (Source: CEA) This is a major problem for this DEIR.</b></li></ul>
<b>Ind 310-14</b>	<p><b>Again, SIGNIFICANTLY ADVERSE WATER &amp; TOXIC ISSUES are an IMPORTANT REASON for OPPOSING/REJECTING the proposed project.</b></p>





**DRAFT EIR COMMENTS - Proposed Idaho-Maryland Mine (DEIR).**

**TOXICS EXAMPLE :** The CENTENNIAL SITE is TOXIC! LARGE VOLUMES OF TOXICS would be “located” on both the proposed Centennial site near Downtown Grass Valley and the proposed Brunswick site...

**Ind 310-15** “The Centennial property covers 56 acres and is located at 10344 Centennial Drive in Grass Valley, along Idaho Maryland Road. It is currently County land, but the *City of Grass Valley has included it in their near-term annexation plans.* Up until its closure in 1956, the site was the primary processing and access site for the Idaho Maryland Mine. **The site now contains over 270,000 cubic yards of legacy tailings material. Soil samples show contamination from arsenic, cobalt, barium, mercury, thallium, chromium, copper, lead, zinc, cyanide, vanadium and nickel.** These tailings cannot be used for the base layer of the proposed mine waste pile and must be removed.” (Source: CEA)

**Ind 310-16** “An agreement between Rise Gold and the California Department of Toxic Substances (DTSC) mandates that the contaminated tailings be cleaned up, and a work plan is being prepared. This cleanup project permit is a separate project from the mine permit. The mine proposal includes dumping more mine waste on this site.” (Source: CEA) Where is the completed work plan & is it in the DEIR?

**Ind 310-17**

- **Nevada County already has a legacy of toxic sites left over from the gold mining industry.** Some of those sites remain highly toxic to this day. **Does Nevada County need or want to increase the size and/or number, or both, of TOXIC WASTE SITES, including one very near to central Grass Valley?**

**Ind 310-18**

- Other waste has accumulated from former gold country operations in the bottom of San Francisco Bay. **Will the mining industry – the proposed Rise Gold mine -- clean up their new toxics as well as the existing toxics on the property they purchased in 2017, knowing the toxics had been there for decades.** Will Rise Gold’s proposed project help to pay to clean up the existing toxics accumulated on their property, and washed downstream from Wolf Creek to the San Francisco Bay?

**Ind 310-19** **CONSIDERING the RISKS that MITIGATIONS are NOT COMPLETED and are INADEQUATE, I consider there are sound environmental and economic reasons to reject the DEIR and the proposed mine reopening project on this site, very near downtown Grass Valley, and several important Grass Valley business districts.**

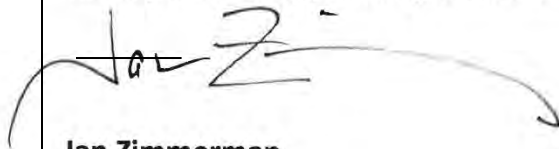


**DRAFT EIR COMMENTS - Proposed Idaho-Maryland Mine (DEIR).**

**CONCLUSION:** Again, having reviewed many DEIRs as a Municipal Advisory Council member, I consider this DEIR to be **INADEQUATE** in its assessment of **CUMULATIVE IMPACTS, SIGNIFICANTLY ADVERSE IMPACTS, and PROPOSED MITIGATIONS and RISK ASSESSMENTS**, and the **PROPOSED PROJECT** should be **REJECTED** by the Nevada County Planning Commission and Board of Supervisors, along with Nevada County residents!

Ind 310-20

Thank you for the opportunity to comment on this important document.



Jan Zimmerman  
11453 Snowline Road  
Nevada City, CA 94595

***Submitted by Email on April 4, 2022 (and cc by USPS Mail) to:***

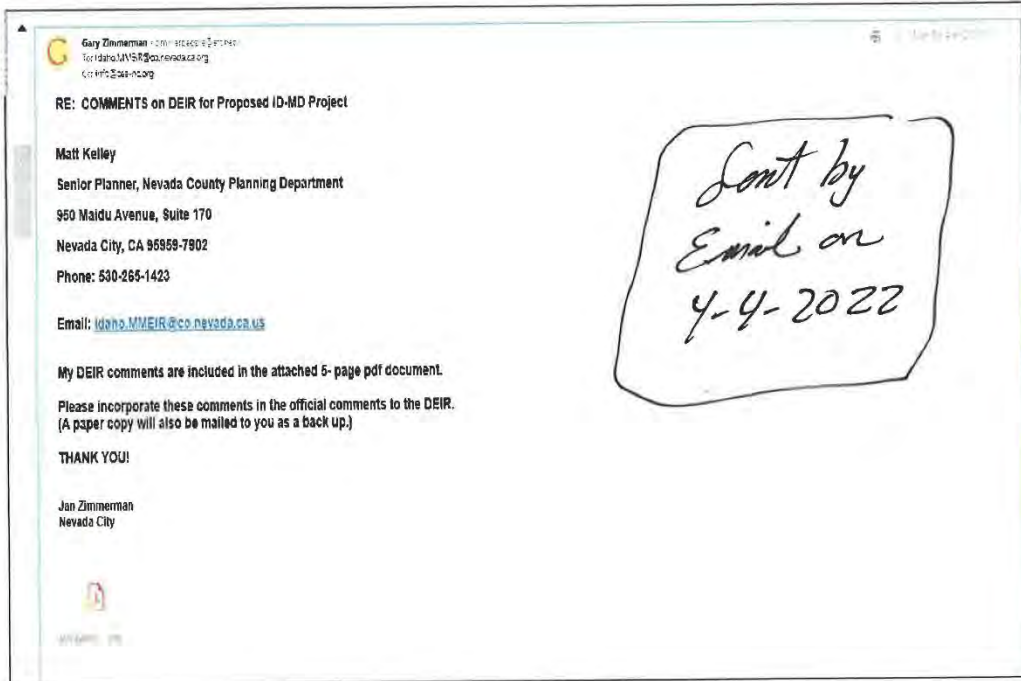
Matt Kelley  
Senior Planner, Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902  
Phone: 530-265-1423

Email: [Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)





Ind 310-21



*Matt Kelley, Senior Planner  
Nevada County Planning Dept  
950 Maidu Ave, Suite 170  
NEVADA CITY, CA 95959-7902*



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## **INDIVIDUAL LETTER 310: JAN ZIMMERMAN**

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### **Response to Comment Ind 310-1**

This comment is introductory in nature and does not address the adequacy of the DEIR. Responses to specific comments are provide below.

### **Response to Comment Ind 310-2**

The commenter states that cumulative effects analysis in the DEIR is inadequate in various areas of the DEIR but provides no further information. Therefore, no specific response is possible. In regard to quality of life concerns, please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Issues.

### **Response to Comment Ind 310-3**

The commenter states that the DEIR inadequately assesses mitigation risk and questions what will happen if the Project Applicant fails to implement required Mitigation Measures, but provides no additional information. The commenter is referred to Master Response 3 – Operator Responsibility.

### **Response to Comment Ind 310-4**

The commenter states that the project's impacts analyzed in the DEIR will last forever and asks whether the mitigation will last forever. The commenter is referred to Master Response 3 – Operator Responsibility and Appendix C of the DEIR.

### **Response to Comment Ind 310-5**

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 310-6**

The commenter states that the dewatering of the Idaho-Maryland Mine will leave nearby residents' private wells without groundwater and will adversely impact the economic value and property rights of nearby residents. Regarding the impacts to groundwater, the commenter is referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding the economic value of the properties, the commenter is referred to Master Response 2 – Social and Economic Impacts.

### **Response to Comment Ind 310-7**

The commenter states that the mitigation measures analyzed in the DEIR are too expensive or will fail but provides no further information or evidence. The environmental impacts of the proposed mitigation measures are analyzed in the DEIR. The commenter is referred to Master Response 3 – Operator Responsibility.

### **Response to Comment Ind 310-8**

The commenter states that cumulative impacts do not match proposed mitigations, but provides no further information or evidence. Therefore, no specific response is possible.

### **Response to Comment Ind 310-9**

The commenter references Comment Letter 10 from the Nevada Irrigation District (NID) and incorporates the same concerns as the NID. The commenter is referred to Chapter 4.8 of the DEIR (Hydrology and Water Quality), Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Responses to Agency Letter 10 from the NID.



**Response to Comment Ind 310-10**

The commenter states that the dewatering of the Idaho-Maryland Mine will result in the discharge of toxic substances into South Fork Wolf Creek. The commenter is referred to Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek.

**Response to Comment Ind 310-11**

The commenter assumes that the discharge of water into South Fork Wolf Creek will harm the creek. The commenter is referred to Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek.

**Response to Comment Ind 310-12**

The analysis in the DEIR is specific to the currently proposed project for the Idaho-Maryland Mine. The commenter is referred Master Response 13 – Historic Hydrogeologic Assessments.

**Response to Comment Ind 310-13**

The commenter states that the groundwater impacts associated with the San Juan Mine Ridge Mine constitutes a major problem with the Idaho-Maryland Mine DEIR. The San Juan Ridge Mine Project is not relevant to the analysis of the Idaho-Maryland Mine DEIR. The commenter is referred to Chapter 4.8 of the DEIR and Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

**Response to Comment Ind 310-14**

The commenter states that adverse water and toxic issues require the County to reject the project, but does not provide any additional information. The analysis in the DEIR determined that water and air impacts are less than significant after mitigation. The commenter is referred to Chapters 4.3 and 4.8 of the DEIR.

**Response to Comment Ind 310-15**

The commenter states that the current condition of the Centennial Industrial Site is not suitable for the placement of engineered fill. The commenter is referred to Master Response 9 – Historical Mine Waste at Centennial Site, and Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

**Response to Comment Ind 310-16**

The commenter references the approved remediation plan from the Department of Toxic Substances Control for the Centennial Industrial Site and asks if the DEIR includes analysis of the remedial action plan. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

**Response to Comment Ind 310-17**

The comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers. The commenter is referred to Chapter 4.8 of the DEIR (Hydrology and Water Quality), Master Response 9 – Historical Mine Waste at Centennial Site, and Master Response 8 – Mine Waste Characterization.

**Response to Comment Ind 310-18**

The commenter states that former gold mining operations have deposited waste into the San Francisco Bay and asks if the Project Applicant will clean up certain toxics on the property it purchased in 2017, alluding to the Centennial Industrial Site. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.



**Response to Comment Ind 310-19**

The commenter's opposition to the proposed project and speculation regarding whether the mitigations will be completed does not address the adequacy of the DEIR and has been noted for the decisionmakers. All mitigation measures for the project have been included in the Mitigation Monitoring and Reporting Program (MMRP) prepared for the project and included as Chapter 4 of this Final EIR. The MMRP gets adopted along with EIR certification, should this occur, and is used by County staff to track project compliance with mitigation measures. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

**Response to Comment Ind 310-20**

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues. Please also see the above responses.



**Individual Letter 311**

**From:** Janak Kimmel <janak.buddhist.yogis@gmail.com>  
**Sent:** Tuesday, January 4, 2022 6:54 PM  
**To:** Idaho MMEIR  
**Subject:** due to current schedule - email response may be delayed Re: Notice of Availability of a Draft Environmental Impact Report (EIR) and Notice of Public Meeting to Provide Comments on the Idaho-Maryland Mine Draft EIR

**Ind 311-1**

**CAUTION:** This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I will try to get back to you as soon as I can. It may take days longer. Thank you.





**INDIVIDUAL LETTER 311: JANAK KIMMEL**

---

**Response to Comment Ind 311-1**

The comment does not address the adequacy of the DEIR.



**Individual Letter 312**

**From:** jane baylis-garcia <sanctuaryjbg715@gmail.com>  
**Sent:** Sunday, April 3, 2022 6:26 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@ceanc.org  
**Subject:** Comments on the DEIR

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**Ind 312-1**

I have lived and worked in Nevada county for 30 years. My husband was an , and elected Fire Commissioner in Penn Valley from 2002-2006.I have worked in the local hospital as a Registered nurse.

Our children have attended school , my daughter teaches 2nd grade and my grandchildren are now in elementary school here. We have gathered many friends and coworkers during these years and frequently

discuss the changes and progress of our local community. I can definitely state that the overwhelming majority of these friends and family are extremely concerned with the plan that Rise Gold Company has of re-opening

the Idaho-Maryland mine.

**Ind 312-2**

I have read the DEIR and as a professional health worker , see many omissions of the health risks such a mine will pose to us as residents. There is inadequate protection in place for the monitoring of the air quality

**Ind 312-3**

(That is already bad in our community). In these times of inadequate rainfall and serious impacts to ground water, the plan does not sufficiently address the impact the millions of gallons of water that must be pumped from

**Ind 312-4**

the mine, just to begin the digging. Peoples wells will be impacted and that poses a real threat to residents and businesses.

The many negative impacts this opening will have on traffic, noise, toxic chemical waste piles, will wipe Grass Valley off the map as a place to tour and vacation, as well as a healthy place to raise

**Ind 312-5**

a family.

I will not go into detail, but the DEIR is a flawed piece of work that does not adequately provide for study and adequate protection on multiple subjects that are necessary for maintaining a healthy and

**Ind 312-6**

thriving community.

Rise Gold is posed to sacrifice our quality of life here in Grass Valley and the surrounding areas for their self-profit motives. They have a poor reputation for polluting in their own country and are



Ind 312-7

eager pursue doing the same to our community,

It is notable that we are still trying to clean up the environmental disaster left us by the last "gold-rush". We have more than allowable levels of Mercury, Arsenic and Heavy Metals in all our surrounding waters and land.

Please do not allow this to go further without careful and complete examination of the risks to us all. We stand to lose our way of life, our health, our future just for the greed of a company that will take its profits and leave us a poisonous place to try and live in.

Sincerely in hopes that you will keep our wellbeing in your decision,

Jane Baylis-Garcia



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## **INDIVIDUAL LETTER 312: JANE BAYLIS-GARCIA**

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### **Response to Comment Ind 312-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 312-2**

Please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR for more information related to air pollution. As evaluated under Impact 4.3-2, and shown in Table 4.3-21, emissions of toxic air contaminants (TACs) would not result in health risks to nearby receptors in excess of NSAQMD thresholds. Nonetheless, Mitigation Measure 4.3-2 was included to ensure an Asbestos Dust Mitigation Plan is prepared, as required by the California Air Resources Board (CARB). Further information regarding the assumptions used when conducting the Health Risk Assessment for the proposed project is included in Master Responses 20 through 22. Finally, please also see Master Response 19 – NSAQMD Criteria Pollution Thresholds during Operations.

### **Response to Comment Ind 312-3**

Please see Master Responses 13 through 16 regarding groundwater, including drought and climate change.

### **Response to Comment Ind 312-4**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 312-5**

The comment expresses a general opinion that the DEIR is inadequate, but does not provide specific examples. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 312-6**

The comment does not address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility.

### **Response to Comment Ind 312-7**

The comment is a closing remark and does not specifically address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 313

**DO NOT**  
I ~~support~~ re-opening the Idaho-Maryland Mine **RECEIVED**

NEVADA COUNTY BOARD OF SUPERVISORS  
FEB 23 2022

Please Vote **against**  
**This Disastrous Mine!!**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 and benefits. The mine will also spur an additional 300 jobs through related new businesses in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this can be a big part of Rise Grass Valley's responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jane Garcia

Address 18956 Sanctuary Rd ZIP 95946

Phone Penn Valley, CA

Email Address \_\_\_\_\_

Dist 4

Ind 313-1





## **INDIVIDUAL LETTER 313: JANE GARCIA**

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### **Response to Comment Ind 313-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 314**

**From:** Jane Pomerantz Markham <janeandco@gmail.com>  
**Sent:** Saturday, April 2, 2022 11:11 AM  
**To:** Idaho MMEIR  
**Subject:** opposition to the mine

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Dear Mr. Kelley,

I want to add my name with our Nevada County concerned citizens who oppose the mine for the many reasons thus stated.

Our beloved County does not need this horrible idea that would destroy everything we've worked so hard to create & recreate. If we could vote on this it would lose.

Thank you,

Jane Markham  
18539 Alexandra Way  
Grass Valley, CA 95949  
530-913-9403

**Ind 314-1**



## **INDIVIDUAL LETTER 314: JANE MARKHAM**

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### **Response to Comment Ind 314-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 315**

**From:** Jane Pelton <janepelt@gmail.com>  
**Sent:** Thursday, March 24, 2022 10:27 AM  
**To:** Planning  
**Subject:** Public Hearing re: Idaho-Maryland Mine, 3/24

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Members of the Planning Commission

As a resident of Grass Valley, I urge you to listen to the independent experts who have researched the many potential impacts of the proposal to re-open the Idaho-Maryland mine – air, water, health, explosives, hydrology, energy, mine waste, monitoring, oversight – and who have determined that the DEIR under your consideration today is woefully inadequate for its purpose. The DEIR must be revised to include analyses of impacts that were underestimated or not evaluated, and to correct misleading conclusions.

Ind 315-1

Hardrock mining is a dirty business. Air, water, and soil impacts, and industrial accidents with the potential to cause great harm, are inevitable in this business.

It is my hope that Nevada County will at long last determine that hard rock gold mining in a populated region that is surrounded on all sides by homes, businesses, and schools, is in no way compatible with the community that Grass Valley has become. The mine property should be permanently zoned for a sustainable alternative job-producing purpose that will allow our region to thrive.

Jane Pelton

Grass Valley



## **INDIVIDUAL LETTER 315: JANE PELTON**

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### **Response to Comment Ind 315-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 316**

**From:** [Ed Scofield](#)  
**To:** [Julie Patterson-Hunter](#)  
**Subject:** FW: Idaho Maryland Mine  
**Date:** Tuesday, March 15, 2022 10:58:14 AM

**Dist 1**

-----Original Message-----

From: Jane Primrose <janenevadacity@gmail.com>  
Sent: Tuesday, March 15, 2022 9:29 AM  
To: Ed Scofield <Ed.Scofield@co.nevada.ca.us>  
Subject: Idaho Maryland Mine

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Dear Supervisor Scofield,

I am writing you to express my thoughts regarding the decision whether to reopen the Idaho Maryland Mine.

To me there is only one issue. This is not about the pros and cons of gold mining. This is about opening a mine in the middle of a fragile population center where a significant portion of the population relies on wells for water. I consider our community to be fragile because of the ongoing threat of wildfire and the continued drought. To allow a mining operation where there is even the remotest chance that the tunnels could pierce the underground water supply cannot be allowed. Such a potential event would be devastating to our towns. I hope you have had an opportunity to visit the Empire Mine Visitor Center and view the model of the warren of mining tunnels already under Grass Valley.

Please do not allow the mine to reopen.

Thank you

Jane Primrose  
13216 Tranquility Lane  
Nevada City, Ca 95959

Sent from my iPad

**Ind 316-1**



## **INDIVIDUAL LETTER 316: JANE PRIMROSE**

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### **Response to Comment Ind 316-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 317**

**From:** rubes@countryrubes.com  
**Sent:** Sunday, April 3, 2022 6:50 AM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** I DO NOT SUPPORT THE OPENING OF THE RISE GOLD IDAHO MARYLAND MINE

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Dear Nevada County Board of Supervisors.

I want to make it known that I DO NOT SUPPORT the opening of the Idaho Maryland Mine for so many environmental reasons.

There have been many letters to the editor of the Union that I agree with and have put it so much more elegantly than me.

Ind 317-1

Steven Ruge: Water Vs Gold March 23, 2022 and Lew Sitzer March 25, 2022

I agree with these letters. In our drought and climate change situations, the thought of flushing away 3 million gallons of water A DAY does not make sense to me at all. We have a farm and must cut back on our water as to allow water for the environment, for the people, let alone the fish and wild animals. To allow this type of waste is inhumane.

Ind 317-2

There are many more letters such as this that we agree with. The Rise Gold EIR where there are obvious omissions of wildlife migration per the letter and video of Michael Shea: Draft EIR displays inadequacies March 20, 2022. This letter proves that the Rise Gold EIR structured their report to their needs and an independent EIR is in need to prove that Rise Gold would have impacts not only on wildlife and water, but noise and air pollution.

My vote is no on the Rise Gold Mine.

Thank you,

Janet Brisson

20693 Dog Bar Road,

Grass Valley, CA 95949



Janet Brisson  
Country Rubes Enterprises  
[rubes@countryrubes.com](mailto:rubes@countryrubes.com)  
530-913-2724  
[www.countryrubes.com](http://www.countryrubes.com)  
20693 Dog Bar Road  
Grass Valley, CA 95949



## **INDIVIDUAL LETTER 317: JANET BRISSON**

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### **Response to Comment Ind 317-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 317-2**

Wildlife migration is address in Chapter 4.4, Biological Resources of the DEIR. Specifically in Impact 4.4-4 starting on page 4.4-92 of the DEIR. The DEIR was prepared by an independent consultant hired by Nevada County and all the technical reports were independently peer reviewed by consultants hired through the County. In its role as the lead agency, Nevada County decisionmakers will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.





**Individual Letter 318**

**From:** [Janet Cinquegrana](#)  
**To:** [Matt Kelley; Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)  
**Subject:** Idaho Maryland Mine  
**Date:** Wednesday, March 23, 2022 10:32:51 PM

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March 24, 2022

My name is Janet Cinquegrana and I reside at 140 Buckingham Ct in Grass Valley, district 3.

I want to voice my opposition to the reopening of the Idaho Maryland Mine. The mine poses so many threats to our air, water and quality of life. I am a homeowner and Wolf Creek flows through my property. I am concerned about the dewatering of the mine and the polluted mine water being pumped into Wolf Creek. I am concerned about the blasting that would occur and the pollution to our air, including releasing carcinogenic asbestos. I am concerned about the diesel truck exhaust and increased traffic. I am worried the opening of the mine would result in our property values being reduced by 20% or more. Furthermore, the mining industry does not create a lot of jobs. In fact in a list of 179 industries it is dead last at job creation. There are so many risks to the mine and little to none rewards. Please vote NO the reopening of the mine.

--

Janet Cinquegrana  
140 Buckingham Ct  
Grass Valley, CA 95949

**Ind 318-1**



## **INDIVIDUAL LETTER 318: JANET CINQUEGRANA**

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### **Response to Comment Ind 318-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. In addition, see Master Response 35 regarding discharge into South Fork Wolf Creek. Impacts related to blasting are addressed in Chapter 4.7, Hazards and Hazardous Materials, as well as Chapter 4.10, Noise and Vibration, of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 319**

**From:** [Janet Cinquegrana](#)  
**To:** [BOC Public Comment](#)  
**Subject:** Idaho Maryland Mine  
**Date:** Friday, March 18, 2022 4:44:32 PM

Dist 3

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March 18, 2022

My name is Janet Cinquegrana and I reside at 140 Buckingham Ct in Grass Valley, district 3.

I want to voice my opposition to the reopening of the Idaho Maryland Mine. The mine poses so many threats to our air, water and quality of life. I am a homeowner and Wolf Creek flows through my property. I am concerned about the dewatering of the mine and the polluted mine water being pumped into Wolf Creek. I am concerned about the blasting that would occur and the pollution to our air, including releasing carcinogenic asbestos. I am concerned about the diesel truck exhaust and increased traffic. I am worried the opening of the mine would result in our property values being reduced by 20% or more. Furthermore, the mining industry does not create a lot of jobs. In fact in a list of 179 industries it is dead last at job creation. There are so many risks to the mine and little to none rewards. Please vote NO the reopening of the mine.

--

Janet Cinquegrana  
140 Buckingham Ct  
Grass Valley, 95949

**Ind 319-1**



## **INDIVIDUAL LETTER 319: JANET CINQUEGRANA**

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### **Response to Comment Ind 319-1**

Please see Response to Comment Ind 318-1.



**Individual Letter 320**

February 12, 2022

Nevada County Planning Commission  
950 Maidu Avenue, Suite 170  
Nevada City, CA, 95959

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.
- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area.
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- While Rise Gold shareholders profit, the local community gets little revenue.
- Where will the imported workers live when housing is so limited in our area?

I am a member of the local faith-based organization the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,



Janet L. Dunstan  
19595 Bow Valley Road  
Grass Valley, CA 95945  
Phone number: 530-205-8154  
Email: janetldunstan@gmail.com



Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

Ind 320-1





## **INDIVIDUAL LETTER 320: JANET DUNSTAN**

---

### **Response to Comment Ind 320-1**

Please see Master Responses 1, 2, 3, and 14. In addition, please refer to Chapter 4.1, Aesthetics, and Chapter 4.12, Transportation with regard to impacts associated with hauling and piling waste rock, as well as Chapter 4.10, Noise and Vibration, and Chapter 4.6, Geology and Soils, with regard to impacts associated with blasting. Housing is addressed in Chapter 4.9, Land Use and Population and Housing. The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 321

Dist 1

**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JANEY RICHMAN FEB 29 2022  
Address 20832 RISING SUN RR. 62945  
NEVADA COUNTY  
BOARD OF SUPERVISORS  
Phone \_\_\_\_\_  
Email Address \_\_\_\_\_

Ind 321-1



## **INDIVIDUAL LETTER 321: JANET RICHMAN**

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### **Response to Comment Ind 321-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 322**

**From:** [Janet Rosner](#)  
**To:** [bdofsupervisors](#)  
**Subject:** Mine  
**Date:** Monday, February 21, 2022 5:55:50 PM

Dist 1

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**To:** [bdofsupervisors@co.nevada  
.ca.us](mailto:bdofsupervisors@co.nevada.ca.us)  
**Subject:** Mine

**Ind 322-1**

Do not reopen the mine...the increased air pollution, risks to waterways and traffic are not worth it. It would negatively impact our community.

Janet Rosner  
15737 American Hill  
Rd., Nevada city

[Sent from AT&T Yahoo Mail for iPhone](#)



## **INDIVIDUAL LETTER 322: JANET ROSNER**

---

### **Response to Comment Ind 322-1**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





Individual Letter 324

Ind 323-1

~~DO NOT~~ NO NO NO NO  
**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than \$90,000 plus benefits. The mine will also spur an additional 300 jobs through related new businesses in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Disagree  
RECEIVED  
FEB 22 2022  
NEVADA COUNTY  
BOARD OF SUPERVISORS

Name(s) Janette + Chris Carpenter  
Address 14406 Falling Star LN ZIP 95949  
Phone 530-263-9214  
Email Address juanitagent@gmail.com  
Janette Carpenter M.D.

Dist 2



## **INDIVIDUAL LETTER 323: JANETTE AND CHRIS CARPENTER**

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### **Response to Comment Ind 323-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 324**

Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959

April 3, 2022

Dear Mr. Kelly,

My name is Janice Bedayn, I am a 23-year resident of downtown Grass Valley, and work for the nonprofit organization Sierra Harvest. I am concerned about the Idaho-Maryland Mine DEIR submitted for review for many reasons, but my primary concern is the proposed mitigation for air quality.

**Ind 324-1**

As many residents of Nevada County have done, I installed an Air Quality app on my phone, so that I can determine the safety of leaving my home to work or recreate in the outdoors. It is frightening that we already are burdened with an average of 102 days in which the air is considered "unhealthy" and with the advent of wildfires, our air quality is too often considered "very hazardous".

**Ind 324-2**

Mitigation of CHG emissions in the DEIR are weak, especially when qualifiers such as "where feasible" are inserted, such as 4.3-7 (a) b) which employs electrical or alternative fueled construction equipment. Who monitors "where feasible"? Electrical construction equipment would indeed go a long way to mitigate CHG emissions, but how much of that equipment is available? If it is expensive, is it still feasible? Who determines that?


**Ind 324-3**

More concerning is 4.3-7 (b) which employs carbon offsets for construction emissions. How does a carbon offset improve the air quality in Nevada County? Carbon offsets may be a valuable tool in addressing global climate change, but the Idaho-Maryland Mine Project's carbon offsets will do nothing to mitigate the impact of unhealthy air in our local community.

**Ind 324-4**

Please require that this project employ more stringent mitigation efforts for air quality, and ensure that those efforts will be monitored, with an identified monitoring agency, and what their responsibility entails to keep the community informed. The suggested mitigations in the current DEIR are simply inadequate to the task. A further assault on our air quality in Nevada County will harm our health and well-being, economy, and quality of life.

Thank you,

  
Janice Bedayn  
311 Bernice Drive  
Grass Valley, CA 95945



---

## **INDIVIDUAL LETTER 324: JANICE BEDAYN**

---

### **Response to Comment Ind 324-1**

The comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers. Please see Master Response 1.

### **Response to Comment Ind 324-2**

The commenter states that GHG mitigation measures are “weak” because they include qualifying terms such as “feasible” for implementation of mitigation. While the commenter describes the mitigation as weak due to the qualifying language that the mitigation must be feasible, this term come directly from the CEQA Guidelines. (see 14 CCR Sec. 15041(a).) Per CEQA Guidelines Section 15041, a CEQA lead agency has authority to require “feasible” mitigation, and conversely does not have authority to impose mitigation that is infeasible. Availability of electric equipment and vehicles and alternative fuel equipment is changing as technology improves, so it is appropriate that this mitigation measure includes a feasibility and commercial availability standard. Based on these qualifying terms, use of electric equipment that is not now available may at a later date be required by the County under this mitigation measure. The County has enforcement authority for Mitigation Measure 4.3-7, so it would be at the County’s discretion to determine whether a particular electric vehicle or type of equipment is feasible in economic or practical terms. Note that the project is already proposing to use all electrical equipment underground, which reduces GHG emissions compared to use of diesel equipment below the surface.

### **Response to Comment Ind 324-3**

Greenhouse gas emissions contribute to climate change but are not directly related to health impacts. Please see Chapter 4.3 of the DEIR in regard to the analysis of health risks from the project’s air emissions. The carbon offsets are required to mitigate emissions of greenhouse gases and the related global climate change impacts, so the local air quality is not related to this mitigation.

### **Response to Comment Ind 324-4**

Please see Master Response 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criteria Pollution Thresholds During Operation. A mitigation monitoring and reporting program is included as Chapter 4 of this Final EIR, which sets forth all mitigation measures imposed in the DEIR and will be used by the County for enforcement purposes.



**Individual Letter 325**

Dist 3

**RECEIVED**

MAR 03 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

February 24, 2022

**Ind 325-1**

Dear Nevada County Board of Supervisors:

My name is Jason Privett and I live near the Empire Mine State Park in District 3 with my wife and our baby daughter. I am writing this letter to urge you to vote NO on the Idaho-Maryland Mine.

My wife and I moved to Grass Valley in August 2021 to escape the crime and noise of San Francisco. We were drawn to the natural surroundings of Grass Valley and the peaceful landscape. We didn't know at the time that the mine was being considered, otherwise, we would've chosen to move elsewhere.

**Ind 325-2**

Our daughter's pediatrician recently informed us of the negative health consequences the mine will have on our family if it is approved. This saddens us deeply. We are very health conscious and moved here because we thought it would be a healthier environment to raise our daughter. I am a longshoreman at the Port of Oakland where I am subjected to loud industrial noises. As a result, I have experienced negative health consequences. This influenced me to extensively study sound healing and the negative health impacts of loud noises and vibrations. I worry such vibrations and noises produced by the mine will severely damage the health and happiness of our community and the reasons people are drawn here.

**Ind 325-3**

Please do not damage our scenic community and pollute our water and air. We moved here for a healthier life for our beloved baby daughter, not increased toxins and industrial vibrations. Please vote No on the Idaho-Maryland Mine.

Sincerely,



Jason Privett





## **INDIVIDUAL LETTER 325: JASON PRIVETT**

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### **Response to Comment Ind 325-1**

The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 325-2**

Please refer to Chapter 4.10, Noise and Vibration, regarding impacts related to noise. The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 325-3**

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 326

*Sierra Metal Fabricators Inc.*

529 SEARLS AVE., NEVADA CITY, CALIF. 95959 • PHONE (530) 265-4591 • FAX (530) 265-4034

Matt Kelley,  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 94959-8617

Mr. Kelley:

I am writing today in support of Rise Grass Valley's application to re-start the Idaho-Maryland mine and rehabilitation of the Centennial site adjacent to Highway 49. Our company believes this project will be vital to the future of Nevada County and we urge the Board of Supervisors to approve the project with haste.

Sierra Metal Fabricators was founded in 1974 in Nevada City. We have a long and solid history and investment in Nevada City and Nevada County, and we know how difficult it is for people to make ends meet here. In recent years our county has changed a great deal as more and more out-of-county retirees have purchased homes in the area. While their arrival is more than welcome, we've unfortunately seen the county become less understanding of the need to build industry locally that can offer a young workforce a reason to invest and grow in this county. Simply put, too many of our young people in this county are forced to leave for better opportunities elsewhere.

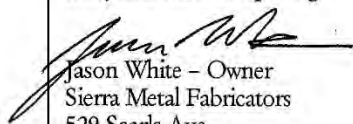
Ind 326-1

The Idaho-Maryland Mine is a chance to turn that around – provide young people in our county with a chance to prosper without moving to Roseville, Sacramento or Reno to make ends meet. Think about it: 312 direct new jobs, and maybe as many as 1,000 more created from companies that partner with Rise Gold – Is there any other local project offering that kind of growth on the horizon?

If the Board of Supervisors rejects the Idaho-Maryland Mine, what kind of jobs plan do you have to replace it with? What other businesses will dare to invest in Grass Valley if they see our County leaders turn up their noses at the opportunity to inject new wealth into our region.

I have already had the opportunity to do business with Rise Gold, in support of their recent core drilling program. I found their personnel to be both professional and competent. I believe them to be an organization not just interested in operating a profitable business, but one that is dedicated to operating in a responsible manner and being an important member of the local community.

For the good of our residents and our local economy, I urge you to support Rise Gold's Idaho-Maryland Mine re-opening.

  
Jason White – Owner  
Sierra Metal Fabricators  
529 Searls Ave.  
Nevada City, CA 95959



## **INDIVIDUAL LETTER 326: JASON WHITE**

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### **Response to Comment Ind 326-1**

The comment expresses support for the project, but does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 327**

**From:** [jay jacquet](#)  
**To:** [RCS Public Comment](#)  
**Subject:** Objection to proposed mine and mailer  
**Date:** Wednesday, February 16, 2022 4:22:11 PM

Unable to identify Dist

**CAUTION:** This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I have received a mail-in card from the proponents of the Idaho Maryland Mine which only has one option- support. Which is misleading and not in keeping with the citizen's goals which are clean air, clean water and protection of the land.

If the Board is aware of this mailing, it may want to intervene and offer an option of opposing the project.

I am a senior citizen and a former City, State of California, and U.S. Dept of the Interior employee. I urge the Board to abandon this campaign to reopen the mine for the obvious reasons: that mitigations and proposed green-friendly practices are not the same as no interference with water, air quality and quality of life in this Community. Developer's proposals in this case are false and misleading.

As a former City Clerk, I understand the way Developers present false statistics and promise more than can be delivered when trying to persuade Agencies to vote their way in the name of jobs and not ruining the land.

I sincerely hope that intelligent decisions by the Board which forbid these types of developments in our County will prevail. If the project is approved, there will be no way to reverse all the damage to the environment. Mitigations proposed are false in this type of a project. There will be negative results.

If this Mine proposal comes to the voters, it will fail. If the Board approves the mine, all of Nevada County will fail.

I urge a no vote on the mine and the Board's refusal to allow a company from out of the Country to do business and to do harm in Nevada County.

J E de Sevren Jacquet  
Resident and Voter

**Ind 327-1**



## **INDIVIDUAL LETTER 327: JAY JACQUET**

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### **Response to Comment Ind 327-1**

The commenter expresses general concerns regarding the proposed project but does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 328**

**From:** [Louis Quaintance](#)  
**To:** [Idaho NMEIR](#)  
**Subject:** DEIR comments  
**Date:** Monday, April 4, 2022 9:43:51 AM

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To: Nevada County Planning Commission  
Attn: Matt Kelley, Senior Planner  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959

To the Planning Commissioners and Staff

**Ind 328-1**

As a resident of Nevada County, I am very concerned about Rise Grass Valley's proposal to reopen the Idaho-Maryland Mine. The Draft EIR for the proposal should adequately address the mine's potential environmental impacts and include adequate mitigations for all impacts. Instead the DEIR shows a lack of responsible due diligence to address many community concerns about this project.

**Ind 328-2**

**Chapter 1.3 Approach to Centennial Industrial Site Baseline**  
The proposed DTSC remediation project to clean up the Centennial Site should have been included as part of this DEIR. How can total impacts of the Mine Project be understood if baseline conditions at both sites are not established prior to all work done for both projects? What are the cumulative environmental impacts when the Centennial Site DTSC project is included as part of this DEIR?

**Ind 328-3**

**Chapter 4.3 Air Quality and Green house Gas Emissions**  
Additional car, truck, onsite diesel and gas engines will contribute significant emissions because of this project. During Public Safety Power Shutdowns, the mine intends to use emergency generators for continuing operations. Nevada County is vulnerable to the effects of Climate Change, including increased risk of wildfires. Already, Western Nevada County has been designated a "non-attainment area for ozone", as monitored by the California Air Resources Board.

**Ind 328-4**

Given the increase in emissions of the proposed project, how can Nevada County attain the goal of 51% reduction in greenhouse gas emissions, as called for in the Nevada County Energy Action Plan, if this project is approved?

**Ind 328-5**

How does the County attain 3% annual reduction in ozone if this project is approved?

**Ind 328-6**

The DEIR should require measurement and effective mitigations over all 80 years of mine operation. Why are air quality measures being limited to one year of construction?



<b>Ind 328-7</b>	What are the planned alternative transportation options to cars and trucks? What is planned beyond minor adjustments to traffic flows?
<b>Ind 328-8</b>	Alternatives to “open burning of vegetative matter shall only be used unless deemed infeasible”. What are the conditions that make this mitigation infeasible?
<b>Ind 328-9</b>	Use of the Grid is offered as mitigation, as if the Grid does not create emissions to generate power. Certainly, climate change and drought conditions will reduce available hydro-electric power. How can the Grid be depended upon to generate power that does not produce emissions?
<b>Ind 328-10</b>	Buying carbon offsets will do little to mitigate local impacts of this project’s emissions. How can offset benefits stay local to improve air quality within Nevada County?
<b>Ind 328-11</b>	The mitigations for Greenhouse Gas Emissions are dependent on future actions of households and other commercial businesses to reduce their emissions throughout California. Why isn’t this proposed project taking responsibility for its emissions? Any reductions that others can attain should not be used to justify this project’s level of emissions.
<b>Ind 328-12</b>	Does the DEIR address emissions in conjunction with the development of properties in the surrounding area in Nevada County? What are likely future emissions when all planned development is accounted for in measuring total impacts?
<b>Ind 328-13</b>	<b>Chapter 4.4 Biological Resources</b> The goal of the California Biodiversity Initiative “is to secure the future of California’s biodiversity”. One of its broad goals is to “Preserve ecosystems at the regional scale, with sufficient linkages, buffers, and refugia to provide a robust future for all native species in the face of climate change”. This DEIR does not adequately address mine impacts on the “linkages, buffers, and refugia” located on and near the property.
<b>Ind 328-14</b>	Empire Mine State Historic Park borders the Rise GV property. Wolf Creek flows through, and adjacent to, the Rise GV property. Wolf Creek’s watershed includes varied habitats along the creek, its associated meadows, and the pond located on the Brunswick site. The DEIR misrepresents the nature of the property’s wetlands. For example, the “clay-lined pool” is actually a vibrant habitat for native California flora and fauna.
<b>Ind 328-15</b>	The Peer Review of the Biological Resources Reports Prepared for the Proposed Idaho-Maryland Mine, done by Madrone Ecological Consulting, states the DEIR “fails to analyze the Project’s effects on the special-status species with potential to occur within South Fork Wolf Creek or downstream areas”. “Lack of documentation of a species during a non-protocol level survey should not be considered justification for low rankings”.
<b>Ind 328-16</b>	The DEIR cites surveys which were done in December 2018, July/August 2019, August 2020; not the best months for trying to document migrating and breeding birds. At minimum, surveys should have been done when native plants and wildlife are “evident and identifiable”.
<b>Ind 328-17</b>	In an area of Empire Mine State Historic Park, 1/2 mile from the proposed project, Gold Country Avian Studies has data that documents Willow Flycatcher, a California Endangered Species





	<p>Olive-sided Flycatcher, a CDFW Species of Special Concern Yellow-breasted Chat, a CDFW Species of Special Concern Yellow Warbler, a CDFW Species of Special Concern Data of these bird species has been submitted to the California Natural Diversity Database. This documentation of vulnerable bird species, and mitigations for impacts to them, should have been included in the DEIR.</p>
Ind 328-18	<p><b>4.10 Noise and Vibration</b> The DEIR does not adequately address the impacts of noise and vibration on wildlife, especially on nesting bird species. The noise levels considered “less than significant” in the DEIR go beyond those that impact wildlife. Mitigations should result in levels below 40 dBA in the South Fork Wolf Creek watershed within the Mine properties and all areas of the Mine that border Empire Mine State Historic Park.</p>
Ind 328-19	<p>The majority of studies documented effects from noise, including altered vocal behaviour to mitigate masking, reduced abundance in noisy habitats, changes in vigilance and foraging behaviour, and impacts on individual fitness and the structure of ecological communities. <b>This literature survey shows that terrestrial wildlife responses begin at noise levels of approximately 40 dBA, and 20% of papers documented impacts below 50 dBA.</b> Our analysis highlights the utility of existing scientific information concerning the effects of anthropogenic noise on wildlife for predicting potential outcomes of noise exposure and implementing meaningful mitigation measures.” A synthesis of two decades of research documenting the effects of noise on wildlife, Shannon, et al Biological Reviews, 26 June 2015</p>
Ind 328-20	<p>CEA, Community Environmental Advocates, has written an extensive list of comments on behalf of many concerned Nevada County community groups. As a member of Sierra Foothills Audubon Society and Redbud Chapter of the California Native Plant Society, I urge that all these comments be considered seriously, and the DEIR corrected.</p>
Ind 328-21	<p>Nevada County is a beautiful place to live and work despite its history of gold mining. We are surrounded by signs of the environment’s recovery from the destructive nature of past mining projects. Why should Rise Grass Valley be permitted to add to the sad history of environmental destruction in Nevada County for 80 years into the future and beyond?</p> <p>Sincerely,</p> <p>Jean Matsuno 10777 Banner Mine Way Nevada City, CA 95959 <a href="mailto:ltquain@gmail.com">email: ltquain@gmail.com</a></p>



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## **INDIVIDUAL LETTER 328: JEAN MATSUNO**

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### **Response to Comment Ind 328-1**

The commenter states the DEIR is inadequate but provides no specifics or evidence in this comment. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 328-2**

Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

### **Response to Comment Ind 328-3**

Criteria pollutant emissions and greenhouse gases from the project are analysed in Chapter 4.3 of the DEIR and impacts have been determined to be less than significant after mitigation. The DEIR assumed 100 hours of generator use in the air quality analysis; however, extended use of generators is speculative and CEQA does not require analysis of speculative impacts. Given that it is unknown if/ when a PSPS would occur, it is considered a speculative event, and per the CEQA Guidelines, if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145). California courts have consistently held that “an EIR is not required to engage in speculation in order to analyze a worst-case scenario.” (see *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 373.). The use of emergency generators is speculative and beyond the reasonable control of the applicant. However, criteria air pollutant emissions associated with 24-hour operation of the emergency generators is provided in Table 4.3-25 of the DEIR on page 4.3-104 for informational disclosure purposes only.

DEIR Chapter 4.13 analyzed the project’s potential contribution to wildfire risk. Regarding climate change, please see Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 328-4**

Please see Master Response 25 – Nevada County Energy Action Plan.

### **Response to Comment Ind 328-5**

Please see Master Response 18 – Air Quality Thresholds. The County’s attainment of compliance with ozone standards is to be achieved by County-wide implementation of Northern Sierra Air Quality Management District thresholds and mitigation, as well as continuing improvements in technology and emissions standards. The Project Applicant is not solely responsible for meeting the County’s air quality objectives.

### **Response to Comment Ind 328-6**

Air quality measures are not limited to one year of construction. Please see Chapter 4.3 of the DEIR. Also see Master Response 19 – NSAQMD Criteria Pollution Thresholds during Operations.

### **Response to Comment Ind 328-7**

As discussed on page 4.12-82 of the DEIR, because the proposed project is anticipated to directly employ approximately 312 employees during full operations, pursuant to Section L-II 4.1.9 of the Nevada County LUDC, the Project Applicant would be required to submit to the County a detailed analysis of transportation alternatives, documenting feasible measures for reducing auto dependence. Please see pages 4.12-82 through 4.12-83 for further information. Further, the proposed project would incorporate an area for bicycle racks at the Brunswick Industrial Site, which would provide a minimum of 11 racks (44 bicycle spaces).



### **Response to Comment Ind 328-8**

The Final EIR will clarify that burning of vegetative material will be prohibited in a condition of approval, which shall be included in the mitigation monitoring and reporting program.

### **Response to Comment Ind 328-9**

Electrical grid power generates no on-site air emissions. Electrical grid power indirectly generates greenhouse gases (GHG) from power generation, but substantially less greenhouse gas emissions than diesel or gasoline powered generators and machinery.

### **Response to Comment Ind 328-10**

Climate Change is a global impact, so purchase of carbon offsets is related to a global impact rather than local air quality. Also see Master Response 28 – Greenhouse Gas Credits.

### **Response to Comment Ind 328-11**

Please see Master Response 27 – Greenhouse Gas Thresholds.

### **Response to Comment Ind 328-12**

Please see Chapter 4.3 regarding analysis of cumulative air quality impacts. Also see Master Response 18 – Air Quality Thresholds.

### **Response to Comment Ind 328-13**

The DEIR biological impact analysis is based on the guidance provided in the CEQA guidelines, Appendix G. DEIR Chapter 4.4 analyzed six different biological impacts including potential impacts to special status species and associated habitat and migratory corridors.

### **Response to Comment Ind 328-14**

The DEIR, and Appendix F.7, correctly identify the onsite pond as a historic man-made clay-lined pond that was associated with historic saw milling operations. The pond is non-jurisdictional pursuant to the federal Clean Water Act but may be considered a “water of the State of California.” Special status species that may use the pond and surrounding habitat were considered in Impact 4.4-2 and impacts to “waters” was considered in Impact 4.4-3.

### **Response to Comment Ind 328-15**

The Madrone peer review was in regard to the draft copies of the various biological studies completed by the applicant’s biological consultant and not the updated analysis that served as a basis for the DEIR. As stated on page 4.4-1 of the DEIR, the reports were updated, as necessary to address the comments included in the third-party independent peer review performed by Madrone Ecological Consulting, Inc. under contract with Raney. Please see Master Response 30 – Technical Study Adequacy.

### **Response to Comment Ind 328-16**

Please see Master Response 30 – Technical Study Adequacy, and Master Response 37 – Birds and Raptors.

The CEQA guidelines require analysis of substantial interference to "the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." Migration is defined as the seasonal movement of animals from one habitat to another. Various animal, bird, and fish species are not automatically considered migratory just because they move from one location to another. Migration serves a purpose for the species such as winter/summer habitat for foraging or breeding. It is acknowledged and analyzed in the DEIR impact analysis (see section 4.4.4) that species exist within the project site that are common to the area. Potential impacts to these





species were analyzed and mitigation measures have been provided where it was determined impacts to species could occur as a result of project activities, including the implementation of preconstruction surveys and agency permitting requirements. The only migratory species acknowledged by the County General Plan is deer migration corridors. Impact 4.4-4 addressed the project's impact to this potential migratory corridor and concluded it was less than significant.

**Response to Comment Ind 328-17**

Please see Master Response 37 – Birds and Raptors.

**Response to Comment Ind 328-18**

Noise and vibration impacts to species was analyzed in DEIR section 4.4.4, Impact 4.4-2, and was determined to be less than significant. It should be noted, increases in daytime and nighttime ambient noise level increases caused by activities at the Brunswick Industrial Site do not extend to the Empire Mine State Park (EMSP) boundary (see DEIR Figure 4.10-7). Engineered fill placement at the Centennial Industrial Site is the closest project activity to the EMSP and could last approximately 6 years. The nearest receptor to the EMSP is number 8 (see DEIR Figure 4.10-3) and the closest noise and vibration measurement location is number 7 and 8 (see Figure 4.10-3). As shown in DEIR Table 4.10-12, Centennial Industrial Site engineered fill activity does not exceed existing baseline noise levels (see Table 4.10-6). As a result, wildlife species that may use the EMSP should not experience an increase in noise levels above ambient levels and therefore, such impacts would be considered less than significant.

**Response to Comment Ind 328-19**

Please see Response to Comment Ind 328-18 above.

**Response to Comment Ind 328-20**

Comment noted. Please see responses to comments in Group Letters 7 and 8.

**Response to Comment Ind 328-21**

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.



**Individual Letter 329**

<b>Ind 329-1</b>	<p>Dear Rise Mine Project We would like to voice my opposition to this project. Our main concern is the impact on the groundwater water and the straining the limited water resources we are currently facing in a decade long drought. Specifically the disruption of water tables ,fissures and aquifers that are in place currently <u>meeting</u> the demands of the Nevada county population.</p>
<b>Ind 329-2</b>	<p>Referring to The Rise Mine DEIR Putting a strain on the already existing water resource by: 1) The need to purchase 5,700 gallons per day for the Rise Mine Project potable water needs as well as 42,000 gallons per day for dust suppression; this combined estimated total per year is over 17 million gallons annually.</p>
<b>Ind 329-3</b>	<p>2) The disruption of existing wells by draining the mine and impacting water tables in place for decades 3) The mine development plan calls for new tunnels being drilled at all times in any and all directions. This <b>will</b> impact water tables and water sources further siphoning an already fragile water eco system.</p>
<b>Ind 329-4</b>	<p>As a homeowner we are dependent on groundwater. Working for 50 years in a profession that consumes millions of gallons of potable water .I believe this water need estimate to be severely under projected. This is a lot of water farmers, ranchers, wildlife and the public would no longer have access to.</p>
<b>Ind 329-5</b>	<p>I am deeply concerned that the Rise Mine Project will impact groundwater and run wells dry leaving homeowners with worthless property that is uninhabitable, devalued and unable to be sold.  Sincerely Michael and Jeannine Mayer</p>



## **INDIVIDUAL LETTER 329: JEANNINE MAYER**

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### **Response to Comment Ind 329-1**

The commenter opposes the project primarily due to the project's impacts to groundwater water supplies during the drought. The commenter does not discuss the adequacy of the DEIR. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 329-2**

The commenter is concerned about the project's water usage but does not identify any inadequacies with the DEIR analysis. The commenter's concerns about the project have been forwarded to the decisionmakers.

### **Response to Comment Ind 329-3**

The commenter states that the project will adversely impact groundwater wells but does not state how the DEIR is inadequate in this regard. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality), which found impacts to groundwater supplies to be less than significant after implementation of mitigation. The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 329-4**

The commenter states that the project will expand underground mine workings and disrupt groundwater wells, but provides no additional detail on why the DEIR's analysis of impacts to groundwater is inadequate.

The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR and Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, Master Response 33 – Groundwater Dependent Vegetation, and Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 329-5**

The commenter reiterates concerns regarding groundwater and states that impacts to private wells will devalue property. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.



Individual Letter 330

Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170 Nevada City, CA 95959-7902  
Phone: 530-265-1423  
Email: Idaho MMEIR@co.nevada.ca.us

March 23, 2022

Dear Mr. Kelly, and the Planning Commission/Board of Supervisors,

Ind 330-1

My name is Dr. Jeff Brownwood, a family practice physician and Nevada County resident of 24 years. As a physician, parent and a concerned citizen, I have significant concern about the viability and the advisability of reopening the Idaho Maryland Mine with an 80 year mining operations permit, based on the Draft Environmental Impact Report.

The DEIR for this permit is inadequate to consider granting this permit. There are so many impact concerns, both presumably mitigatable and unmitigatable, it is inconceivable to me that the Board would consider granting the permit. The impact concerns revolve around the quality of life in Nevada County, noise, traffic, environment, water risks, and property values.

Ind 330-2

When land use zoning was initially created in our area, industrial mining was the charter in the late 1800s. We are now a residential and light business area. Allowing a large industrial mining operation to reopen for all practical purposes in residential Grass Valley is so short sighted and irresponsible, to me, it ultimately defies comprehension.

As a physician, if a medicine or treatment has more risks than benefits, you do not use that medicine. You might fix something specific but overall kill the patient.

Ind 330-3

The thing that really got my attention is the permit is to run 24/7 for 80 years, heavy cargo truck loads of ore out highway 174 or 49, something like 14,000 loads per year. The noise and congestion would make our rural towns low quality places to live. House values would go down 10-20% in my opinion. For all intents and purposes this is a hidden \$50k tax on every homeowner in Nevada County to fund this project. And, within a several mile radius, I have concerns that dewatering the mine and vibration from operations will impact well water supply to many homes.

Ind 330-4

The DEIR specifically identifies 3 unmitigatable impacts and 85 presumably mitigatable impacts. I have real concern that a large industrial business such a Rise Gold figures is it will much easier and better to ask for forgiveness than for permission when it comes to the presumably correctable environmental impacts.

The unmitigatable three impacts are Aesthetics, noise and vibration, traffic congestion. The reality is: mining involves what the DEIR itself calls "reasonably foreseeable" accidents, lack of proper management, oversight and mitigation. Multiply those concerns over 80 years and this transforms Grass Valley and Western Nevada County into an industrial area.

Ind 330-5

A large, heavy industrial operation with its blasting, processing and transporting immediately adjacent to Grass Valley (and very close to the Gold Hill and Greenhorn Rd neighborhoods) would significantly impact the quality of life of our community at large, degrade the environmental integrity of the Wolf Creek watershed, and potentially be a hazard and a danger to all. The DEIR lists "significant impacts" also to water quality, air quality, the emission of green house gasses, wetlands, and species of concern. The project also proposes sending all the mine water it needs to pump out of the mine daily into the Wolf Creek watershed, through Grass Valley, and involves other impactful details the DEIR does not consider a problem.

Ind 330-6

The DEIR also suggests that all but three of the 85 significant impacts can be mitigated to at least reasonable levels. However, if we multiply those concerns over 80 years, Grass Valley and Nevada County are transformed into heavy industrial area. This is not reasonable or desirable. The DEIR is inadequate to consider proceeding further with the permit. Please address these concerns as you and the Board move forward with your deliberations.

With concern for our county and quality of life,  
Sincerely,

Jeff Brownwood, DO  
16400 Lake Vera Purdon Rd.  
Nevada City, CA 95959  
[jobcomm1203@yahoo.com](mailto:jobcomm1203@yahoo.com) (530) 815-6649



## **INDIVIDUAL LETTER 330: JEFF BROWNWOOD**

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### **Response to Comment Ind 330-1**

The commenter is opposed to the project based on several impacts discussed in the DEIR. The commenter's opposition to the Proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues. Impacts of the project to the environment, traffic, noise, and water are analyzed in the DEIR. In regard to quality of life and property values, the commenter is referred to Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

### **Response to Comment Ind 330-2**

The commenter states that the Nevada County is now a residential and light industrial area and does not want a mining operation in the community. The commenter's opposition to the Proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 330-3**

The commenter is concerned that the Idaho-Maryland Mine would operate 24 hours a day, 7 days a week for 80 years and the traffic impacts the project would generate. The commenter is specifically concerned about traffic impacts to State Routes 49 and 174. The DEIR states that operation truck traffic would, at the most, occur from 6:00 AM to 10:00 PM. (DEIR, Table 4.12-7.) The DEIR also states that no project truck traffic would occur on State Route 174. (DEIR, Table 4.12-9.) The DEIR's Chapter 4.12 (Transportation) analyzed traffic impacts and found those impacts to be less than significant after mitigation, with the exception of the intersection at Brunswick Road and State Route 174 and the Brunswick Road and Sutton Way intersection, where impacts would be significant and unavoidable even after implementation of mitigation. (DEIR, pp. 4.12-56, 116.) The commenter is also concerned about impacts to noise and impacts to private wells from the dewatering of the mine but does not provide any additional information. Those potential impacts were analyzed in Chapter 4.8 (Hydrology and Water Quality) and Chapter 4.10 (Noise and Vibration). Finally, the commenter states that the project would result in decreased property values. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 330-4**

The commenter references Impact 4.7-2 which discusses hazards to the public through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. (DEIR, p. 4.7-35.) However, the commenter does not provide any additional information on why the DEIR is inadequate. As stated on page 4.11-25 of the DEIR:

In addition, underground metal mining has injury rates similar to residential construction and injury rates are significantly less than agriculture, truck transportation, and logging. The non-fatal lost time injury rate for underground metal mining of approximately 1.5 injuries per year per 100 workers is similar to that experienced in the residential construction industry.<sup>29,30</sup> From the period of 2016 to present, only two fatal injuries have occurred in all the underground metal mines combined in the United States (both in 2018).<sup>31,32</sup>

The commenter is also referred to Master Response 3 – Operator Responsibility.





**Response to Comment Ind 330-5**

The commenter states that the discharge of the treated water to South Fork Wolf Creek will degrade the watershed but does not state how the DEIR is inadequate. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) and Master Response 35 – Discharge to South Fork Wolf Creek. The commenter also raises concerns regarding hazards, water quality, air quality, and GHGs, wetlands, and species of concern, but provides no information on which to formulate a specific response. These impacts are discussed in Chapter 4 of the DEIR. In regard to quality of life and property values, the commenter is referred to please see Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

**Response to Comment Ind 330-6**

The commenter states that the DEIR's impacts, which are less than significant after mitigation, will become significant over the course of the 80-year project but does not explain why. Cumulative impacts have been analyzed in the DEIR. The commenter's opposition to the Proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.



**Individual Letter 331**

**From:** Jeff Claussen <jclaussen395@gmail.com>  
**Sent:** Monday, April 4, 2022 9:12 AM  
**To:** Idaho MMEIR  
**Subject:** Comments for Draft EIR on Mine reopening

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**Ind 331-1**

Please see my comments for the Draft EIR on the proposed Idaho Maryland Mine reopening:

**Ind 331-2**

1. What agency regulates and inspects storage and safety of explosives on the mine property?

**Ind 331-3**

2. How often would these inspections take place?

**Ind 331-4**

3. What are the OSHA guidelines for above ground explosive inventory storage and the distance to residential areas?

**Ind 331-5**

4. Regarding explosive material delivery to the site, who would ensure that delivered explosives are immediately taken underground for storage?

**Ind 331-6**

5. How quickly would this take place upon opening the mine if the tunnels are not structurally safe and dewatered yet?

**Ind 331-7**

6. There will be above ground explosive inventory storage at some point in the mine operation schedule, so where and how would that happen?

**Ind 331-8**

7. Who would inspect that storage facility?

**Ind 331-9**

8. How would any above ground explosive inventory storage affect wildland firefighting efforts and response considering potential explosive hazards in the event of a wildland fire event?

**Ind 331-10**

9. How would this potential hazard of above ground explosive inventory storage affect the major public evacuation route of Highway 174 in the event of a large regional wildfire considering the proximity of Highway 174 to the mine property?

**Ind 331-11**

10. Regarding the Centennial Property, how would the mine waste rock be disposed of there?

**Ind 331-12**

11. What are the hours of operation?

**Ind 331-13**

12. Will there be night lighting?

**Ind 331-14**

13. What about noise and dust from equipment operation?

**Ind 331-15**

14. How would arsenic in the mine waste rock be controlled from spreading via dust and wind to the surrounding community and downtown Grass Valley?

**Ind 331-16**

15. How would the dust levels be monitored and mitigated if found to be unhealthy?

**Ind 331-16**

16. What are the OSHA and Nevada County Environmental Health Regulations regarding arsenic and asbestos dust from construction activities?

Thank you,  
Jeff Claussen  
[jclaussen395@gmail.com](mailto:jclaussen395@gmail.com)  
Nevada City resident



## **INDIVIDUAL LETTER 331: JEFF CLAUSSEN**

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### **Response to Comment Ind 331-1**

The commenter asks which agency is responsible for regulating and inspecting the storage of explosives at mining operations. The onsite storage and use of explosives is regulated by state and federal laws and regulations as discussed on pages 4.7-23 through 4.7-28 of the DEIR. The U.S. Mine Safety and Health Administration (MSHA) is responsible for the inspection of explosives storage and use in underground mines.

### **Response to Comment Ind 331-2**

The commenter asks how often inspections occur for the use of explosives at mining operations. As stated on page 4.7-13 of the DEIR, MSHA is required to inspect each underground mines at least four times a year.

### **Response to Comment Ind 331-3**

The commenter asks what OSHA guidelines govern above ground explosives. The project does not propose to store explosives on the surface.

### **Response to Comment Ind 331-4**

The commenter asks who would ensure that explosives delivered to the project site are immediately taken underground for storage. The management and employees of the mine are responsible for transferring explosives from surface to underground.

### **Response to Comment Ind 331-5**

The commenter asks how soon explosives would be needed should the Idaho-Maryland Mine reopen. Explosives would not be required before the mine is dewatered. Explosive magazine and ground support requirements for explosives storage areas are discussed on pages 4.7-26 through 4.7-28 of the DEIR.

### **Response to Comment Ind 331-6**

The commenter asserts that the project will, at some point, store explosives on the surface. The project does not propose to store explosives on the surface.

### **Response to Comment Ind 331-7**

The commenter asks who would inspect the explosives storage facility. MSHA would inspect underground explosive storage facilities.

### **Response to Comment Ind 331-8**

The commenter asks how aboveground storage of explosives would impact wildland firefighting efforts. The project does not propose to store explosives on the surface.

### **Response to Comment Ind 331-9**

The commenter asks how aboveground storage of explosives would impact an evacuation during a wildfire. The project does not propose to store explosives on the surface.

### **Response to Comment Ind 331-10**

The commenter asks how the engineered fill would be placed at the Centennial Industrial Site. As stated on page 3-33 of the DEIR, the engineered fill would be transported from the Brunswick Industrial Site to the Centennial Industrial Site using haul trucks. Approximately 1.6 million tons



of engineered fill would be trucked from the Brunswick Industrial Site to the Centennial Industrial Site over a five-year period for placement and compaction. The average transport of engineered fill would be 1,000 tons per day or 365,000 tons per year. A maximum transport rate of up to 2,000 tons of engineered fill per day is required to make up for periodic weather or operational delays. Truck payloads would be approximately 20 tons per truck and, therefore, would require up to 100 trips per day and an average of 50 trips per day. Engineered fill may be mixed on-site using mobile equipment to ensure uniformity and meet specifications for compaction. Engineered fill would continue to be placed, graded, and compacted in a series of lifts to an elevation ranging between 2,520 and 2,570 means sea level (approximately 30 to 70 feet above ground surface). Fill slopes would be 3:1 (horizontal to vertical) or flatter (see Figure 3-14). Following completion of fill activities, the fill slopes would be revegetated to control erosion and ensure slope stability. The final grading would result in 37 acres of flat developable land on property zoned industrial.

### **Response to Comment Ind 331-11**

The commenter asks what the hours of operation are for the project. Hours of operation for project activities are shown in Table 3-7 of the DEIR.

### **Response to Comment Ind 331-12**

The commenter asks if the project will have night lighting. The project will have night lighting at the Brunswick Industrial Site. The commenter is referred to Section 4.1-3 of the DEIR.

### **Response to Comment Ind 331-13**

The commenter is concerned about noise and dust from the project equipment. Noise from equipment operation is analyzed in Chapter 4.10 (Noise and Vibration) of the DEIR. Dust emissions are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR.

### **Response to Comment Ind 331-14**

The commenter asks how arsenic would be controlled from spreading via dust and wind. The commenter is referred to Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and Appendix E.1 of the DEIR regarding air emission modelling and health risk assessment including dust control methods, assumptions, and required mitigation measures. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring.

### **Response to Comment Ind 331-15**

Please see Response to Comment Ind 331-14.

### **Response to Comment Ind 331-16**

The commenter asks what OSHA and Nevada County Environmental Health regulations govern arsenic and asbestos dust from construction activities. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The Nevada County Environmental Health Department does not regulate arsenic or asbestos in dust. The action level for inorganic arsenic is 5 micrograms per cubic meter and permissible exposure limit under OSHA regulations



for inorganic arsenic is 10 micrograms per cubic meter. (29 CFR 1926.1018.) The time weighted average limit for asbestos is 0.1 fiber per cubic centimeter and excursion limit is 1 fiber per cubic centimeter under OSHA regulations for asbestos. (29 CFR 1926.1101.)





**Individual Letter 332**

14933 Pathan Pl.  
Nevada City, CA 95959

February 24, 2022



Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

Dear Mr. Kelley,

I'm a medical doctor, and have lived in Nevada County most of my life.

I oppose Rise Gold Corporation's proposal to re-open the Idaho-Maryland mine because it will irreparably damage our community in many ways. For the purpose of addressing the DEIR, I'll limit these comments to its effects on our air quality.

The mine's damage to our air quality is, frankly, unmitigatable. Virtually any quantum of its emissions will raise Nevada County's incidence of illness and death despite any mitigation, as I'll explain.

The air quality in California in general is already poor. According to the American Lung Association, the five cities in the country with the worst annual particulate pollution and highest ozone levels are in California, and include the Sacramento-Roseville region.

California's most air-polluted cities are also those most affected by our now-endemic wildfires, which severely aggravate monthly and annual air pollution averages. With its warmer and drier conditions, ongoing climate change intensifies wildfires, so worsens California's air quality and the consequent health effects.

Nevada County is even more affected than the state. The American Lung Association gives our community an F grade for ozone levels, designating 105 days per year "unhealthy." Our county has long been considered "Sacramento's tailpipe," as auto exhaust emitted there funnels here. And during the past two summers, wildfires contributed to entire weeks which the Northern Sierra Air Quality Management District labeled "very hazardous."

**Nevada County can't tolerate additional air pollution. That bears repeating: Nevada County can't tolerate additional air pollution.**

Airborne elements from the mine will include dust, ozone, and noxious particulates and chemicals, not to mention considerable greenhouse gases. The project will emit copious diesel particulate matter (DPM), of which most is small enough to readily enter human lungs. Current and future Nevada County children will absorb more of the mine's DPMs than today's adults do, both because of their more rapid respiratory rate and eight decades of exposure.

The particles we'll all inhale include asbestos, silica, and various heavy metals. DPM is also composed

Ind 332-1

Ind 332-2



of numerous organic compounds, including more than forty known cancer-causing substances like polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. The California Air Resources Board has classified DPMs as a Toxic Air Contaminant. The CARB estimates that about 70% of the cancer risk that the average Californian faces stems from these diesel exhaust particles.

Ind 332-3

The DEIR Table 4.3-19 estimates that maximum mitigated emissions of all reactive organic gases, oxides of nitrogen, carbon monoxide, oxides of sulfur, and particulate matter of 2.5 to 10 microns diameter will total 341 lb per day during the project's first four years, 332 lb daily during the next five years, and 293 lb during each day of the project's final sixty-nine years. That is, the DEIR estimates that despite all mitigations, however effective, the mining operation will release 8.5 million pounds--3900 metric tons--of pollutants known to be toxic into our community over the next eighty years. And this does not include emissions generated in post-mining reclamation.

Nor does it include emissions from idling diesel engines. In its Air Quality report of 2020, the DUDEK Corporation estimated (p. 135) that the project's diesel idling would amount to 200,000 minutes annually. The DEIR, though, explicitly omits the effects of idling (p. 4.3-95): "Starting and idling emissions, which are minor, are excluded because the focus is on the Vehicle Miles Traveled rather than the ultimate origin and/or destination of each trip." We've all heard and smelled diesel delivery trucks as they idle; imagine the same from a fleet of twenty-ton haulers.

Ind 332-4

The DEIR specifies abundant mitigation requirements, as it should. But in practice, the mining industry in general has a record of neglecting or circumventing mitigations. The DEIR requires, for example, that the operation must utilize environmental state-of-the-art "Tier 4" diesel engines "...if commercially available," meaning that if they're unavailable for some reason (for example, p. 4.3-78: "...taking into consideration factors such as critical path timing of construction and geographic proximity of the equipment location to the project sites"), dirtier engines will suffice. In practicality, Rise Gold won't need to use the environmentally cleanest engines if it's inconvenient.

Ind 332-5

That's only one mitigation out of a number larger than any public agency can monitor, enforce or, most importantly, afford. The history of mining, especially in Nevada County, indicates that mitigation measures are generally underfunded, poorly enacted, and often virtually ignored, leaving the local community ruined and its taxpayers left to clean up the mess. Rise Gold's CEO's British Columbia Banks Island mine misadventure is a prime example of such irresponsibility.

Ind 332-6

Whatever benefits this project might bring to Nevada County, it is certain to damage our health. Our mortality rate from chronic lung disease is double the rate in California statewide: 69 versus 35 deaths per 100,000 people. Many of us are already at risk simply for our age. According to the 2020 census, one in three of us is 65 or older, compared to the statewide proportion of one in seven. Our heart disease mortality rate is half-again higher than statewide. In 2014 Sierra Nevada Memorial Hospital saw 369 adults and children for acute asthma and admitted 88, at cost of over \$3 million, and that represents only one single illness. Mining emissions, featuring a wide assortment of irritants and carcinogens both known and unknown, will raise the incidence of local pulmonary and cardiac illnesses, with all their personal and financial costs.

Ind 332-7

The DEIR asserts that none of Rise Gold's operations, properly mitigated, will violate standards. Its repeated conclusions, "no significant impact," were written by people who won't live here the next



↑  
eighty years. As an avalanche of numbers, the DEIR can look like science, but as a trained scientist, I'm dubious. The data are based on estimates supplied by Rise Gold. Considering its environmental record and misleading advertising, due diligence requires our skepticism. We should also recognize that Federal, State, and county agencies' complex standards and thresholds for air quality do not exemplify science. They are useful and sensible, but necessarily arbitrary, and deliberately ignore varieties of human experience like anxiety, irritation, aesthetics, and sensitivity to noise and odor. And alarmingly, the DEIR does not take into account air quality effects on the thousands of voiceless Nevada County residents who will be born during the next eighty years.

Ind 332-8

The DEIR's air quality section describes the effects of only this project, ignoring that its toxicities will add to the onerous burden the County already carries. Even if all its mitigation recommendations were enacted, they won't reduce the project's air toxicities and greenhouse gases to zero. Again, Nevada County can't tolerate additional air pollution.

Considering the proposal's predictable injuries to Nevada County's health, beauty, economics, and well-being, no one who values our community can claim it has redeeming value. I urge Nevada County's Planning Department and Supervisors to find the DEIR unacceptable, and to reject the proposal.

Respectfully,

  
Jeff Kane MD





## **INDIVIDUAL LETTER 332: JEFF KANE**

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### **Response to Comment Ind 332-1**

This comment is introductory in nature and the commenter opposes the project. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

The commenter states that the project's damage to air quality will be unmitigable but does not address the adequacy of the DEIR. The DEIR's analysis of air quality impacts included a health risk assessment and found air quality impacts to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The commenter is referred to Master Response 18 – Air Quality Thresholds.

### **Response to Comment Ind 332-2**

The commenter states that the project will expose Nevada County residents to dust, ozone, asbestos, silica, diesel particulate matter, GHGs, and noxious particulates and chemicals but does not specify how the DEIR is inadequate. The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds.

### **Response to Comment Ind 332-3**

The commenter references DEIR Table 4.3-19, which indicates the maximum mitigated daily project emissions per source and type of emission and states that the project will emit 8.5 million pounds of emissions over the course of the lifespan of the use permit. As shown in Table 1.3-19 and discussed in DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), the Northern Sierra Air Quality Management District (NSAQMD) has established thresholds of significance for ROG, NOx, and PM10. The project emissions of these constituents are not significant after mitigation and applicant proposed measures. There is no threshold established for the sum of all emissions as prepared by the commenter.

The commenter also states that the DEIR omits the GHG impacts of idling diesel engines by citing to the following in the DEIR: "starting and idling emissions, which are minor, are excluded because the focus is on the Vehicle Miles Traveled rather than the ultimate origin and/or destination of each trip." (DEIR, p. 4.3-95.) However, this same language is contained in the Air Quality and Greenhouse Emissions Analysis prepared by Dudek (DEIR, Appx. E.1., p. 45.) Starting and idling GHG emissions were included in the project's GHG emission estimates. DEIR page 4.3.95 discusses the exclusion of starting and idling GHG emissions from the calculation of emissions of off-site mobile source GHG emissions by air district. As stated in the DEIR, this information is provided only to facilitate full public disclosure and to present the magnitude of potential GHG emissions occurring within other air districts.

### **Response to Comment Ind 332-4**

The commenter states that the mining industry in general either neglects or circumvents mitigation measures and implies that the Project Applicant will do the same. However, the commenter provides no evidence to substantiate this claim. The commenter specifically points to Mitigation Measure 4.3-1(b) as evidence that the Project Applicant will only use Tier 4 Final engines if



commercially available. However, the APM-AQ-1 (applicant proposed measure) would require all off-road diesel-fueled and emergency generators owned by the Project Applicant to be Tier 4 Final engines. (DEIR, p. 4.3-65.) Moreover, Mitigation Measure 4.3-1(b) requires the submission of a Construction Exhaust Emissions Minimization Plan in which the Project Applicant must demonstrate compliance with the Mitigation Measure. The Mitigation Measure is also enforceable by the County. Regarding the assertion that the Project Applicant would not follow mitigation measures, the commenter is referred to Master Response 3 – Operator Responsibility.

#### **Response to Comment Ind 332-5**

The commenter questions whether mitigation measures can be enforced by the County and provides an opinion of the Project Applicant's character. The commenter is referred to Master Response 3 – Operator Responsibility.

#### **Response to Comment Ind 332-6**

The commenter states that any benefit of the project is outweighed by impacts to air quality but does not state how the DEIR is inadequate. Please see Master Response 1.

#### **Response to Comment Ind 332-7**

The commenter claims that the DEIR is based on estimates supplied by Rise Gold. The DEIR was prepared by Nevada County and all Project Applicant-supplied technical reports were peer reviewed by the County's third-party consultants. Thresholds of significance and project impacts are thoroughly discussed in the DEIR. In regard to the commenter's opinion on the Project Applicant's reputation, the commenter is referred to Master Response 3 – Operator Responsibility. The DEIR takes into account the air quality effects of the project on Nevada County residents, including children. The commenter is referred to Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR and Master Response 18 – Air Quality Thresholds.

#### **Response to Comment Ind 332-8**

The commenter reiterates concerns regarding the project's air quality impacts and opposes the project. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. There is no requirement to reduce emissions, including greenhouse gases to zero. Please see Master Response 27 – Greenhouse Gas Thresholds.





**Individual Letter 333**

**From:** [Jeff Kane](#)  
**To:** [BCS Public Comment](#)  
**Subject:** Letter to Supervisors on IMM DEIR attached  
**Date:** Monday, February 28, 2022 2:41:21 PM  
**Attachments:** [DEIR comments.doc](#)

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February 28, 2022

To: Nevada County Planning Dept. & Supervisors  
Re: Comments on Idaho-Maryland Mine DEIR

From: Jeff Kane MD  
14933 Pathan Pl.  
Nevada City, CA 95959  
530-265-0478

Dear Supervisor:

I'm a medical doctor, and have lived in Nevada County most of my life.

I urge you to reject Rise Gold Corporation's proposal to re-open the Idaho-Maryland mine because it will irreparably damage our community in many ways. For the purpose of addressing the Draft Environmental Impact Report, I'll limit these comments to its effects on our air quality.

The mine's damage to our air quality is, frankly, unmitigatable. Its least emissions will raise Nevada County's incidence of illness and death despite any mitigation, as I'll explain.

**The air quality in California in general is already poor.**

According to the American Lung Association, the five cities in the country with the worst annual particulate pollution and highest ozone levels are in California, and include the Sacramento-Roseville region. California's most air-polluted cities are also those most affected by now-endemic wildfires, which severely aggravate monthly and annual air pollution averages. With its warmer and drier conditions, ongoing climate change intensifies wildfires, so worsens California's air quality and the consequent health effects.

Ind 333-1

**Nevada County is even more affected than the state.**

The American Lung Association gives our community an F grade for ozone levels, designating 105 days per year "unhealthy." Our county has long been considered "Sacramento's tailpipe," as auto exhaust emitted there funnels here. And during the past two summers, wildfires contributed to entire weeks which the Northern Sierra Air Quality Management District labeled "very hazardous." Nevada County can't tolerate additional air pollution.

**The mine will emit massive amounts of numerous respiratory toxins**

Airborne elements from the mine will include dust, ozone, and noxious particulates and chemicals, not to mention considerable greenhouse gases. The project will emit copious diesel particulate matter (DPM), of which most is small enough to readily enter human lungs. The particles we'll all inhale include asbestos, silica, and various heavy metals. DPM is also composed of numerous organic compounds, including more than forty known cancer-causing substances like polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. The California Air Resources Board has classified DPMs as a Toxic Air Contaminant. The CARB estimates that about 70% of the cancer risk that the average Californian faces stems from these diesel exhaust particles.

Ind 333-2

**Even optimally mitigated, the mine's toxic airborne emissions will be massive.**



The DEIR Table 4.3-19 estimates that maximum mitigated emissions of all reactive organic gases, oxides of nitrogen, carbon monoxide, oxides of sulfur, and particulate matter of 2.5 to 10 microns diameter will total 341 lb per day during the project's first four years, 332 lb daily during the next five years, and 293 lb during each day of the project's final sixty-nine years. That is, the DEIR estimates that despite all mitigations, however effective, the mining operation will release 8.5 million pounds--3900 metric tons--of pollutants known to be toxic into our community over the next eighty years. And this does not include emissions generated in post-mining reclamation.

Nor does it include emissions from idling diesel engines. In its Air Quality report of 2020, the DUDEK Corporation estimated (p. 135) that the project's diesel idling would amount to 200,000 minutes annually. The DEIR, though, explicitly omits the effects of idling (p. 4.3-95): "Starting and idling emissions, which are minor, are excluded because the focus is on the Vehicle Miles Traveled rather than the ultimate origin and/or destination of each trip." We've all heard and smelled diesel delivery trucks as they idle; imagine the same from a fleet of twenty-ton haulers and other industrial engines.

**The mining industry in general and Rise Gold in particular has a record of neglecting or circumventing mitigations.**

Ind 333-3

The DEIR specifies abundant mitigation requirements, as it should. The Report requires, for example, that the operation must utilize environmental state-of-the-art "Tier 4" diesel engines "...if commercially available," meaning that if they're unavailable for some reason (for example, p. 4.3-78: "...taking into consideration factors such as critical path timing of construction and geographic proximity of the equipment location to the project sites"), dirtier engines will suffice. In practicality, if Rise Gold finds it inconvenient, it won't need to deploy the environmentally cleanest engines.

**The DEIR specifies more mitigation requirements than Nevada County can monitor, enforce or, most importantly, afford.**

Ind 333-4

Mining's history, especially in Nevada County, indicates that mitigation measures are generally underfunded, poorly enacted, and often virtually ignored, leaving the local community damaged and its taxpayers left to clean up the mess. The British Columbia government halted Rise Gold's CEO's previous endeavor, the Banks Island mine, and prosecuted and fined him for gross environmental irresponsibility.

**Whatever benefits this project might bring to Nevada County, it is certain to damage our health.**

Ind 333-5

Our mortality rate from chronic lung disease is double the rate in California statewide: 69 versus 35 deaths per 100,000 people. Many of us are already at risk simply for our age. According to the 2020 census, one in three of us is 65 or older, compared to the statewide proportion of one in seven. Our heart disease mortality rate is half-again higher than statewide. In 2014 Sierra Nevada Memorial Hospital saw 369 adults and children for acute asthma and admitted 88, at cost of over \$3 million, and that represents only one single illness. Mining emissions, featuring a wide assortment of irritants and carcinogens both known and unknown, will raise the incidence of local pulmonary and cardiac illnesses, with all their personal and financial costs.

**The mine's toxic airborne emissions will especially impair children's health.**

Ind 333-6

The DEIR does not take into account air quality effects on the thousands of voiceless Nevada County residents who will be born during the next eighty years. Current and future Nevada County children will absorb more of the mine's DPMS than adults do, both because of their more rapid respiratory rate and eight decades of exposure.



Ind 333-7

**The DEIR's assertions of "no significant impact" come from dubious data and arbitrary standards.**

Its data are based on figures supplied by Rise Gold. Considering this company's environmental record and misleading advertising, due diligence requires our skepticism. Further, federal, state, and county agencies' complex standards and thresholds for air quality, while useful and sensible, are necessarily arbitrary and impermanent. (For example, in 2007 The Mining Safety and Health Administration reduced the permissible ambient DPM concentration from 350 to 160 micrograms per cubic meter.) In any case these objective standards deliberately ignore unmeasurable varieties of human experience like anxiety, irritation, aesthetics, and sensitivity to noise and odor.

Ind 333-8

**The DEIR's air quality section describes the effects of only this project, ignoring the fact that they add to our already onerous burden.**

Even if all its mitigation recommendations were enacted, the mine is certain to worsen our air quality even further, and add to illness incidence. Again, Nevada County can't tolerate additional air pollution.

Considering the proposal's predictable injuries to Nevada County's health, beauty, economics, and well-being, no one who values our community can claim it has redeeming value. I urge Nevada County's Planning Department and Supervisors to find the DEIR unacceptable, and to reject the proposal.

Respectfully,



## **INDIVIDUAL LETTER 333: JEFF KANE**

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### **Response to Comment Ind 333-1**

This comment is substantially similar to Comments Ind 332-1 and 332-2. The commenter is referred to Responses to Comments Ind 332-1 and Ind 332-2.

### **Response to Comment Ind 333-2**

This comment is substantially similar to Comment Ind 332-3. The commenter is referred to Response to Comment Ind 332-3.

### **Response to Comment Ind 333-3**

This comment is substantially similar to Comment Ind 332-4. The commenter is referred to Response to Comment Ind 332-4.

### **Response to Comment Ind 333-4**

This comment is substantially similar to Comment Ind 332-5. The commenter is referred to Response to Comment Ind 332-5.

### **Response to Comment Ind 333-5**

This comment is substantially similar to Comment Ind 332-6. The commenter is referred to Response to Comment Ind 332-6.

### **Response to Comment Ind 333-6**

The commenter states that the DEIR fails to consider the project's air quality impact with regard to children. The DEIR's Health Risk Assessment did analyze the project's air quality impacts to children. (DEIR, p. 4.3-61–63.) The commenter is also referred DEIR, Appendix E.1. (Health Risk Assessment), page 357.

### **Response to Comment Ind 333-7**

This comment is substantially similar to Comment Ind 332-7. The commenter is referred to Response to Comment Ind 332-7.

### **Response to Comment Ind 333-8**

This comment is substantially similar to Comment Ind 332-8. The commenter is referred to Response to Comment Ind 332-8.





**Individual Letter 334**

14933 Pathan Pl.  
Nevada City, CA 95959

February 24, 2022



Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

Dear Mr. Kelley,

I'm a medical doctor, and have lived in Nevada County most of my life.

I oppose Rise Gold Corporation's proposal to re-open the Idaho-Maryland mine because it will irreparably damage our community in many ways. For the purpose of addressing the DEIR, I'll limit these comments to its effects on our air quality.

The mine's damage to our air quality is, frankly, unmitigatable. Virtually any quantum of its emissions will raise Nevada County's incidence of illness and death despite any mitigation, as I'll explain.

The air quality in California in general is already poor. According to the American Lung Association, the five cities in the country with the worst annual particulate pollution and highest ozone levels are in California, and include the Sacramento-Roseville region.

California's most air-polluted cities are also those most affected by our now-endemic wildfires, which severely aggravate monthly and annual air pollution averages. With its warmer and drier conditions, ongoing climate change intensifies wildfires, so worsens California's air quality and the consequent health effects.

Nevada County is even more affected than the state. The American Lung Association gives our community an F grade for ozone levels, designating 105 days per year "unhealthy." Our county has long been considered "Sacramento's tailpipe," as auto exhaust emitted there funnels here. And during the past two summers, wildfires contributed to entire weeks which the Northern Sierra Air Quality Management District labeled "very hazardous."

**Nevada County can't tolerate additional air pollution. That bears repeating: Nevada County can't tolerate additional air pollution.**

Airborne elements from the mine will include dust, ozone, and noxious particulates and chemicals, not to mention considerable greenhouse gases. The project will emit copious diesel particulate matter (DPM), of which most is small enough to readily enter human lungs. Current and future Nevada County children will absorb more of the mine's DPMs than today's adults do, both because of their more rapid respiratory rate and eight decades of exposure.

The particles we'll all inhale include asbestos, silica, and various heavy metals. DPM is also composed

Ind 334-1



of numerous organic compounds, including more than forty known cancer-causing substances like polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. The California Air Resources Board has classified DPMs as a Toxic Air Contaminant. The CARB estimates that about 70% of the cancer risk that the average Californian faces stems from these diesel exhaust particles.

The DEIR Table 4.3-19 estimates that maximum mitigated emissions of all reactive organic gases, oxides of nitrogen, carbon monoxide, oxides of sulfur, and particulate matter of 2.5 to 10 microns diameter will total 341 lb per day during the project's first four years, 332 lb daily during the next five years, and 293 lb during each day of the project's final sixty-nine years. That is, the DEIR estimates that despite all mitigations, however effective, the mining operation will release 8.5 million pounds-- 3900 metric tons--of pollutants known to be toxic into our community over the next eighty years. And this does not include emissions generated in post-mining reclamation.

Nor does it include emissions from idling diesel engines. In its Air Quality report of 2020, the DUDEK Corporation estimated (p. 135) that the project's diesel idling would amount to 200,000 minutes annually. The DEIR, though, explicitly omits the effects of idling (p. 4.3-95): "Starting and idling emissions, which are minor, are excluded because the focus is on the Vehicle Miles Traveled rather than the ultimate origin and/or destination of each trip." We've all heard and smelled diesel delivery trucks as they idle; imagine the same from a fleet of twenty-ton haulers.

The DEIR specifies abundant mitigation requirements, as it should. But in practice, the mining industry in general has a record of neglecting or circumventing mitigations. The DEIR requires, for example, that the operation must utilize environmental state-of-the-art "Tier 4" diesel engines "...if commercially available," meaning that if they're unavailable for some reason (for example, p. 4.3-78: "...taking into consideration factors such as critical path timing of construction and geographic proximity of the equipment location to the project sites"), dirtier engines will suffice. In practicality, Rise Gold won't need to use the environmentally cleanest engines if it's inconvenient.

That's only one mitigation out of a number larger than any public agency can monitor, enforce or, most importantly, afford. The history of mining, especially in Nevada County, indicates that mitigation measures are generally underfunded, poorly enacted, and often virtually ignored, leaving the local community ruined and its taxpayers left to clean up the mess. Rise Gold's CEO's British Columbia Banks Island mine misadventure is a prime example of such irresponsibility.

Whatever benefits this project might bring to Nevada County, it is certain to damage our health. Our mortality rate from chronic lung disease is double the rate in California statewide: 69 versus 35 deaths per 100,000 people. Many of us are already at risk simply for our age. According to the 2020 census, one in three of us is 65 or older, compared to the statewide proportion of one in seven. Our heart disease mortality rate is half-again higher than statewide. In 2014 Sierra Nevada Memorial Hospital saw 369 adults and children for acute asthma and admitted 88, at cost of over \$3 million, and that represents only one single illness. Mining emissions, featuring a wide assortment of irritants and carcinogens both known and unknown, will raise the incidence of local pulmonary and cardiac illnesses, with all their personal and financial costs.

The DEIR asserts that none of Rise Gold's operations, properly mitigated, will violate standards. Its repeated conclusions, "no significant impact," were written by people who won't live here the next



↑  
eighty years. As an avalanche of numbers, the DEIR can look like science, but as a trained scientist, I'm dubious. The data are based on estimates supplied by Rise Gold. Considering its environmental record and misleading advertising, due diligence requires our skepticism. We should also recognize that Federal, State, and county agencies' complex standards and thresholds for air quality do not exemplify science. They are useful and sensible, but necessarily arbitrary, and deliberately ignore varieties of human experience like anxiety, irritation, aesthetics, and sensitivity to noise and odor. And alarmingly, the DEIR does not take into account air quality effects on the thousands of voiceless Nevada County residents who will be born during the next eighty years.

The DEIR's air quality section describes the effects of only this project, ignoring that its toxicities will add to the onerous burden the County already carries. Even if all its mitigation recommendations were enacted, they won't reduce the project's air toxicities and greenhouse gases to zero. Again, Nevada County can't tolerate additional air pollution.

Considering the proposal's predictable injuries to Nevada County's health, beauty, economics, and well-being, no one who values our community can claim it has redeeming value. I urge Nevada County's Planning Department and Supervisors to find the DEIR unacceptable, and to reject the proposal.

Respectfully,

  
Jeff Kane MD



## **INDIVIDUAL LETTER 334: JEFF KANE**

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### **Response to Comment Ind 334-1**

This letter is identical to Individual Letter 332: Jeff Kane. The commenter is referred to Responses to Comments Ind 332-1 through Ind 332-8.





**Individual Letter 335**

To: Members of the Nevada County Planning Commission, Nevada County Board of Supervisors, and Nevada County Planning Department Staff

Attn: Matt Kelley, Senior Planner 950 Maidu Ave, Suite 170 Nevada City, CA 95959  
Ph: 530 265-1423

Email: [matt.kelley@co.nevada.ca.us](mailto:matt.kelley@co.nevada.ca.us)  
DEIR Comment Email: [idaho.mmeir@co.nevada.ca.us](mailto:idaho.mmeir@co.nevada.ca.us)

Comments on the Draft Environmental Impact Report for the Idaho-Maryland Mine Project

Dear Friends,

I think the Draft Environmental Impact Report of the Idaho-Maryland Mine Project is a good indicator of this company should not be trusted, as the true negative impacts of the project have been severely understated. Let's go back just a short time ago, to 1993.

In June of 1993, the Nevada County Planning Commission certified the environmental impact report and permit for the San Juan Ridge mine.

**Ind 335-1**

Riki Colby opens the tap and out pours brown water, filled with toxic minerals. "I got kidney pain, I had intestinal problems, I had insomnia." The San Juan Gold Mine was reopened despite concerns from the community, and CEO Tim Callaway gave every assurance to the community and to the county that their operation would be safe, and it would not impact nearby residents. They were wrong, and they poisoned our fellow citizens after their operation ran into major problems in 1995. By 1997 the company's stock price had cut in half, and the mine folded. Once Tim Callaway abandoned the mine and shut off the water pumps, the mine refilled with toxic water, which leached into many wells in the area and into the homes of our community. The well water is still undrinkable for nearby residents because of manganese, iron, and dissolved sulfates. For all intensive purposes, the community had been poisoned. We paid the price, the company left us with an environmental disaster that leached into the Yuba, and all we have to show for it is the bitter test of toxic water and the unfulfilled promises of a gold miner.

<https://vimeo.com/111603225>





↑ Please watch the film. I am including it as supporting evidence in my submission.

Water testing was done at Grizzly Hill school, and indeed, they children's water was contaminated far beyond any allowable health standards.

	Acceptable Amount	Amount Found
Iron	300 ppb	40,200 ppb
Manganese	50 ppb	8,130 ppb
Nickel	100 ppb	726 ppb
Aluminum	1000 ppb	2,700 ppb

If we cannot learn from our own history, right here in our own county, then we have no right to be authorized to make these decisions.

Ind 335-2

Now, in the DEIR, they say they will be discharging effluent from the mining site into our Wolf Creek. They do not say what chemicals will be included in that effluent, and this reflects either insufficient testing, or withholding the dangerous information that is likely to become known. Observing the test results from the San Juan Mine, Iron, Manganese, Nickel, and Aluminum would be poured into our waterways for an unpredicted amount of time. Let's also observe the chemicals that are leached from the explosives, Ammonium Nitrate. The DEIR is extremely deficient in its analysis of chemicals that will be leached from the mine waste and dumped into our rivers as effluent.

Ammonium Nitrate is not something you want to consume, so why would we put it into our drinking water or our irrigation water? What flows into Wolf Creek, flows into the Bear River, and from the Bear River, about 42,000 acres of farmland get their irrigation water. Furthermore, with the Centennial water supply pipeline, a huge volume of that water will be sent to Lincoln, Roseville, and North Sacramento. Let us not forget the groundwater recharge that takes place all along those corridors between Wolf Creek and the Bear River. A true analysis of the number of wells within recharge proximity of the entire downstream watershed has not been done, and proves how deficient this DEIR is.

↓



↑ Furthermore, Ammonium Nitrate has been shown to cause death in tadpoles, frogs and toads, just like our endangered Yellow Legged Frog.

<https://link.springer.com/article/10.1007/s002449900188>

**Lethal and Sublethal Effects of Nitrogen Fertilizer Ammonium Nitrate on Common Toad (*Bufo bufo*) Tadpoles**

Here is another study published in the Journal of Environmental Toxicology and Chemistry, who also demonstrated chronic toxicity from Ammonium Nitrate.

<https://setac.onlinelibrary.wiley.com/doi/abs/10.1002/etc.5620141217>

**Acute and chronic toxicity of ammonium nitrate fertilizer to amphibians from southern ontario**

And here is a third study, The effect of ammonium nitrate fertiliser on frog (*Rana temporaria*) survival

<https://www.sciencedirect.com/science/article/abs/pii/S016788099601095X>

This demonstrates just how toxic are the materials that the mine will be using and dumping into our rivers, our streams, our farmland, and potentially our drinking water. The insufficient explanation of water treatment and expected toxin levels within the effluent illustrates the DEIR is dangerously inadequate.

We love living in this community because it is rebounding from its mining days. Yes mining has left our rivers poisoned with mercury, our fish too dangerous to eat in quantity, and we even endanger our kids and pregnant wives with the latent mercury from one or fish too many, but we live with that threat. We don't need to make it worse. We don't need to ruin our quality of life by turning a beautiful forest into a toxic industrial wasteland poisoning our community and waterways. Thank you for your time.

~ Jeff Litton



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## **INDIVIDUAL LETTER 335: JEFF LITTON**

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### **Response to Comment Ind 335-1**

The commenter states that the DEIR should not be trusted, asserts that the impacts have been understated, and then cites the San Juan Ridge Mine as an example of water contamination caused by a mining operation. Contrary to the commenter's assertion that the DEIR was prepared by the applicant to underestimate impacts, the DEIR was prepared by County's independent EIR consultant and technical studies submitted by the applicant have been peer reviewed by the County's own independent technical experts. With regard to the comparison between the San Juan Ridge mine and the project, these are separate projects, and the project's water quality impacts have been analyzed in the DEIR and found to be less than significant after mitigation. The DEIR's conclusions regarding water quality were also peer reviewed by the County's independent experts, who concurred with the analysis and conclusions.

### **Response to Comment Ind 335-2**

The commenter asserts that the DEIR does not disclose what chemicals will be in the water discharged to South Fork Wolf Creek and that the project could result in ammonium nitrate pollution. The constituents and requirements for the mine water discharge are discussed in detail and analyzed in the DEIR. Please see Master Response 35 – Discharge to South Fork Wolf Creek. An analysis of the number of wells within recharge proximity of the entire downstream watershed is not required as the water discharge will be required to meet all water quality goals.

As discussed on page 4.8-48 of the DEIR, the primary residual components of the ammonium nitrate-fuel oil (ANFO) used for blasting, ammonia and nitrate, are very soluble and mobile in water. This means that any blasting residuals would be continually removed from the mine over time through the dewatering system. The proposed WTP is designed to treat ammonia and other blasting residuals that might occur due to incomplete detonation. Thus, when the mine is allowed to flood again following the completion of mining, there is no reasonable potential that residuals from former blasting activities would cause a violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.



**Individual Letter 336**

**From:** [Jeff Peach](#)  
**To:** [Idaho MMEIR](#)  
**Subject:** All about the water  
**Date:** Saturday, February 12, 2022 6:48:00 PM

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I am really surprised that the mine is even considered. It's all about the water, IMHO. There may be researchers that say the water table won't be affected... If they are wrong, we will be in a worse situation than we already are. Water is becoming a scarce commodity in California and we are going to allow a mining company to come in and pump millions of gallons of water out of the mine? Seems counter intuitive to me.

**Ind 336-1**

--  
Jeff Peach

*We don't stop playing because we grow old, we grow old because we stop playing...*

<http://www.threetimesthrough.com>  
<http://www.facebook.com/threetimesthrough>  
<https://www.youtube.com/user/ThreeTimesThrough>  
<https://www.instagram.com/threetimesthrough/>



## **INDIVIDUAL LETTER 336: JEFF PEACH**

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### **Response to Comment Ind 336-1**

Please see Master Responses 13, 14, 15, and 16.





**Individual Letter 337**

**From:** [Jeff Russell](#)  
**To:** [Idaho MMEIR](#)  
**Subject:** Idaho Maryland mine DEIR  
**Date:** Monday, April 4, 2022 4:26:40 PM

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Mr. Matt Kelley  
Senior Planner

**Ind 337-1**

I have opposed the reopening of the Idaho Maryland mine for the more than 30 years I have lived in Nevada County. Listening to the many comments made at the public meeting on March 24th only served to convince me more what a very bad idea for everyone in the area excepting the owners and stock holders of Rise Gold.

**Ind 337-2**

Personally, I live right above Bennett Meadow. Walking along the stream (South Fork of Wolf Creek) that would be continuous flooded just makes me sad!  
A decision to move forward will do irrevocable damage to the entire ecology of the western Nevada County and the health of all of us.

**Ind 337-3**

There is no good reason to reopen this mine and dredge up all the heavy metals and contaminants sleeping therein! With a lot less effort and with very little consequences, the few jobs that Nevada county residents would glean from the reopening could be generated in more productive and less harmful ways; let's put our efforts there. Not on the travesty we are now facing for the third time. Protect our air, our land, our streams and our people, children and adults alike.

Sincerely, Jeffrey Russell  
10728 Footwall Dr. 95945  
530-277-8021



## **INDIVIDUAL LETTER 337: JEFF RUSSELL**

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### **Response to Comment Ind 337-1**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 337-2**

Please see the analysis under Impact 4.8-3, which starts on page 4.8-69 of the DEIR. As detailed therein, the proposed project would be subject to the requirements set forth in Mitigation Measure 4.8-3, ensuring that the Project Applicant submits a Final Drainage Report to the Nevada County Planning Department for review and approval that demonstrates the on-site storm drain systems are sized such that site runoff (in addition to treated mine discharge for the Brunswick Industrial Site) under the post-development conditions will not exceed pre-development levels in the downstream channel(s) during design storm events. With incorporation of Mitigation Measure 4.8-3, the DEIR concludes that potential impacts related to on- or off-site flooding would be less than significant.

### **Response to Comment Ind 337-3**

Please see Master Responses 1, and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 338

**From:** [J.M.](#)  
**To:** [Idaho MMEIR; Planning](#)  
**Subject:** comment on Idaho Maryland mine  
**Date:** Wednesday, March 16, 2022 11:36:45 AM

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**Ind 338-1**

I'm writing to oppose the opening of the Idaho Maryland mine.

**Ind 338-2**

Others have addressed many details and reasons, so at this time, I'd simply like to point out that the draft Environmental Impact Report (dated December, 2021) is couched to present the mine project as feasible. Throughout, the tone and content work from the underlying assumption that the project is worthwhile, so we all need to figure out how to bring it to fruition. In other words, there is bias. Indeed, the second paragraph of the introduction clarifies that the purpose of the EIR is to inform the public but then to point out ways to minimize adverse environmental effects and offer alternatives to reduce those effects.

**Ind 338-3**

Nowhere does the EIR consider the alternative of denying approval to the project. I regard the EIR as misleading in that it encourages the reader to regard any problems as susceptible to adjusting to what the report disingenuously suggests is nothing more than a somewhat new situation.

**Ind 338-4**

I therefore implore the members of the Planning Commission to study the EIR with a view toward making independent evaluations of the various impacts it describes. To mention just one example, I point out the many comments, tables and descriptions regarding truck traffic and noise. Throughout, the finding is that there will be more traffic, more noise, and more damage to roads, but the conclusion is that we can all live with that. I disagree.

**Ind 338-5**

The broad question is this: why should we endure the sacrifices described in the EIR and elucidated elsewhere so that Rise Gold (a company of questionable integrity) can profit?

I am a sixth-generation resident of the Grass Valley/Nevada City area, a descendant of the men who owned and ran the North Star during the 1860s. Their day is done. Let's chart a twenty-first century course of action that respects and values our community.

Jeffrey Mason



## **INDIVIDUAL LETTER 338: JEFFREY MASON**

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### **Response to Comment Ind 338-1**

Please see Master Response 1.

As discussed on page 1-1 of the DEIR, pursuant to CEQA Guidelines Section 15121, the purpose of the DEIR is to a) inform public agency decision-makers, and the public generally, of the significant environmental effects of the project, (b) identify possible ways to minimize the significant adverse environmental effects, and (c) describe reasonable and feasible project alternatives which reduce environmental effects. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.

As part of assessing potential project impacts that could occur to all environmental issue areas required for analysis under CEQA, the DEIR evaluates the proposed project's consistency with applicable policies, regulations, and standards established at the federal, State, and local levels and incorporates analyses from the County's expert consultants. Where potential impacts are identified, the DEIR sets forth mitigation measures to reduce the severity level of the identified impacts to the extent feasible and discloses the level of impact that would occur subsequent to incorporation of mitigation. As such, the analysis within the DEIR is adequate, meets the requirements set forth by the CEQA Guidelines, and is not biased.

### **Response to Comment Ind 338-2**

The purpose of a DEIR is not to approve or deny a project. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.

### **Response to Comment Ind 338-3**

The comment expresses a general opinion that the DEIR is misleading, but does not provide specific examples that would allow for a detailed response. Please see Response to Comment Ind 338-1.

### **Response to Comment Ind 338-4**

A rise in the levels of truck traffic and noise, relative to existing levels, that could occur through approval of the proposed project does not, in itself, constitute a significant impact. The determination of a potential impact associated with increases in truck traffic and noise would be considered significant is based on applicable thresholds, which are detailed in Chapter 4.10, Noise and Vibration, and Chapter 4.12, Transportation, of the DEIR. For example, the DEIR includes analysis of potential impacts associated with short-term increases in ambient noise levels under Impact 4.10-1, which starts on page 4.10-27. Table 4.10-11 includes applicable noise level thresholds and discloses the receptor locations at which noise generated by project construction activities would exceed such thresholds. Because exceedance of the applicable thresholds could occur, the DEIR sets forth Mitigation Measure 4.10-1 on page 4.10-30, which requires that the project incorporate noise reduction measures during construction of the potable water line along East Bennett Road. However, because the noise reductions that would be achieved by the measures cannot be definitively determined to confirm that noise levels would be reduced to below a level of significance, the DEIR discloses that the impact is considered significant and unavoidable for the purposes of CEQA evaluation. In its role as the lead agency, the County of



Nevada will weigh the overall merits of the project against the impacts identified in the DEIR as part of determining whether the County should approve the project.

**Response to Comment Ind 338-5**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





Individual Letter 339

Jennifer Buck-Diaz  
505 Long Street  
Nevada City, CA 95959  
Email: jenderbucket@gmail.com

April 3, 2022

To: Members of the Nevada County Planning Commission, Nevada County Board of Supervisors, and Nevada County Planning Department Staff

Attn: Mr. Matt Kelley, Senior Planner  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959

Comments on the Draft Environmental Impact Report for the Idaho-Maryland Mine Project

Ind 339-1

I am a Nevada County resident and have lived in the Grass Valley/Nevada City area since 2008. My husband and I purchased our home in 2010 and are raising our two young children here because we enjoy the natural beauty, open space, and ecology of the region.

Ind 339-2

I appreciate the opportunity to provide a comment on the Draft Environmental Impact Report (DEIR) released by Nevada County, which addresses the environmental impacts of re-opening and operating the proposed Idaho-Maryland Mine. As a professional vegetation ecologist with over 20 years of botanical experience, I am concerned about impacts of the mine project on native plants of our region. The environmental analysis of the DEIR is inadequate, and the impacts of this large-scale gold mining project will be significant and unavoidable.

Ind 339-3

The proposed project will significantly affect local groundwater resources by dewatering the Mine and lowering groundwater levels. This will have a direct impact on a very rare plant species (*Juncus digitatus*) located less than 2 miles away from the proposed mine site at the intersection of Idaho-Maryland Road and Brunswick Avenue. This species has only 3 occurrences in the world and is completely dependent on freshwater seeps and springs ( see: <https://rareplants.cnps.org/Plants/Details/3355>, and [https://rareplants.cnps.org/Uploads/ReferenceDocs/JuncusDigitatus\\_20090102\\_StsRevAdd.pdf](https://rareplants.cnps.org/Uploads/ReferenceDocs/JuncusDigitatus_20090102_StsRevAdd.pdf))

Ind 339-4

The DEIR does not provide a comprehensive analysis to determine the extent and the severity of the impacts upon groundwater resources and wells. Without this analysis, the DEIR must identify such impacts as significant and unavoidable. The DEIR lacks an accurate project description, lacks data and analyses needed to make informed determinations, and fails to provide effective and feasible mitigation measures. For these reasons, the document is inadequate under CEQA. The DEIR should be revised and recirculated to comply with CEQA.

Ind 339-5

Thank you for your time and consideration.

Sincerely,

Jennifer Buck-Diaz  
Vegetation Ecologist, Nevada County Resident



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## **INDIVIDUAL LETTER 339: JENNIFER BUCK-DIAZ**

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### **Response to Comment Ind 339-1**

The comment does not address the adequacy of the DEIR.

### **Response to Comment Ind 339-2**

The commenter expresses general concerns regarding the project and the adequacy of the DEIR, but does not provide specific detail regarding the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative issues. With regard to native plants, please see Master Responses 30 and 31.

### **Response to Comment Ind 339-3**

Please see Master Response 33 – Groundwater Dependent Vegetation.

### **Response to Comment Ind 339-4**

Please see Master Responses 13, 14, and 15.

### **Response to Comment Ind 339-5**

The project, as proposed, is detailed in Chapter 3, Project Description, of the DEIR. As part of assessing potential project impacts that could occur to all environmental issue areas required for analysis under CEQA, the DEIR evaluates the proposed project's consistency with applicable policies, regulations, and standards established at the federal, State, and local levels and incorporates analyses from the County's expert consultants. Where potential impacts are identified, the DEIR sets forth mitigation measures to reduce the severity level of the identified impacts to the extent feasible and discloses the level of impact that would occur subsequent to incorporation of mitigation. Where potential impacts would remain significant, even with the incorporation of mitigation, such impacts are concluded within the DEIR to be significant and unavoidable. Table 2-1, which starts on page 2-10 of the DEIR, summarizes all potential impacts evaluated in the DEIR and discloses the potential impacts that would remain significant and unavoidable. The analysis within the DEIR is adequate and meets the requirements set forth by the CEQA Guidelines. The commenter does not provide specific information related to the asserted inadequacies; therefore, a detailed response cannot be provided.



**Individual Letter 340**

**From:** Jennifer W. Burt <jenniferwburt@gmail.com>  
**Sent:** Monday, April 4, 2022 5:06 PM  
**To:** Matt Kelley; Idaho MMEIR  
**Subject:** I-M Mine DEIR comments

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Dr. Jennifer Burt  
Loma Rica Drive  
Grass Valley, CA 95945  
Email: [jenniferwburt@gmail.com](mailto:jenniferwburt@gmail.com)

April 4, 2022

Mr. Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959  
Email: [matt.kelley@co.nevada.ca.us](mailto:matt.kelley@co.nevada.ca.us); [Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

Dear Mr. Kelly:

**Ind 340-1**

I am a Nevada County resident and well-owner in the immediate vicinity of the proposed Idaho-Maryland Mine project. We moved here 10 years ago to raise our children, because we were drawn to the the natural beauty, open space, and ecology of the region, in addition to the local neighborhood draw of pristine well water, the ability to farm on our land, and the quiet ambiance of our neighborhood. Additionally, I am an ecologist by training and career, and have over 20 years of environmental consulting experience and hold M.S. and Ph.D. degrees in ecology.

**Ind 340-2**

It is hard to know where to begin on the extremely insufficient analyses presented in the Draft Environmental Impact Report (DEIR) for the Idaho-Maryland Mine Project, and I find I did not leave myself enough time to be thorough. I submitted a letter to the County during the scoping process requesting that detailed analysis of specific project impacts be carried out, with independent peer-review by topic experts, given the wide and long-term scope and expected negative impacts of this project. These requests were far from met. It is exceedingly clear that this project would create great and lasting harm to the Grass Valley community and our environment, even to Western Nevada County as a whole, yet the DEIR declares most impacts to be less than significant. The analyses and proposed mitigation measures that impact assessments were based on are both inadequate and apparently intentionally misleading.

**Ind 340-3**

The project would have significant aesthetic impacts, including impacts to night sky visibility, scenic vista impacts, and aesthetic impacts of operating an industrial scale mine right in the center of a beautiful rural community that is a tourist destination due to its rural character and charm.





↑	<p>Nevada County already suffers from very poor air quality, and a high rate of lung disease. Fugitive dust and asbestos emissions from the mine operations will worsen this problem. Asbestos was not adequately considered. I agree with the comments made by the CEA letter on this topic.</p>
<b>Ind 340-4</b>	<p>The project did not conduct an adequately detailed and peer-reviewed analysis of how subsurface mining activities within the area may affect potential for increasing local seismic activity and decreasing surface geological stability, as well as potential to affect the structure and function of local groundwater aquifers.</p>
<b>Ind 340-5</b>	<p>The analysis of hazards and hazardous materials was grossly inadequate. The assumption that mine tailings would be saleable should not be assumed for project analysis.</p>
<b>Ind 340-6</b>	<p>I am also in agreement with the points made by the Community Environmental Advocates letter and the Wells Coalition on the insufficiency of the DEIR analysis of groundwater quality and wells impacts. The groundwater modeling analysis does not consider an adequate baseline dataset, neither spatially nor temporally, and should be including many more wells, a larger spatial area, and include a wide range of current water years and months including during prolonged droughts, which are increasingly common. In essence, at least 10 years of baseline data should be required to be collected and analyzed, and modeling improved based on additional data to ensure no significant effects, before the project should be allowed to commence dewatering.</p>
<b>Ind 340-7</b>	<p>The wells monitoring plan does not include a sufficiently wide region around the groundwater effects area to capture potential project effects on depth to groundwater and groundwater quality. It makes an assumption that the over simplistic model has identified the full spatial range of potential project effects and then sets out a plan to conduct monitoring in that same area, which assumes the simplistic model in a complex fractured bedrock groundwater aquifer is correct. This is incredibly circular reasoning and completely inappropriate for a project of this size and scope.</p>
<b>Ind 340-8</b>	<p>The onus of collecting sufficient baseline groundwater/well operation data and ongoing interim- and post-project data to prove that the project is not significantly affecting nearby wells or water quality should be Rise Gold's responsibility, and financial assurances for all mitigation and monitoring should be ensured to the County and its taxpayers, that would remain in place even after the nearly inevitable bankruptcy filing by this mine.</p>
<b>Ind 340-9</b>	<p>Detailed monitoring should occur prior to and during project operation for an area at least five miles out from the mineral rights boundary and thus the potential extent of project-associated groundwater pumping operations over the course of the project.</p>
<b>Ind 340-10</b>	<p>Rise Gold intends to mitigate for well effects by piping water to a small number of homes. It has already been established by many experts weighing in on the analysis conducted that many more wells are likely to be significantly affected by the project than these that have been identified by a simplistic model based on a small number of data points and water years. But furthermore, it should be said that providing piped NID water to homes whose wells are affected by the project does not even fully mitigate for loss of well water availability or well water quality, because NID fees are high, and baseline water quality of NID water is lower than the water obtained via local wells currently.</p>
<b>Ind 340-11</b>	<p>Groundwater dependent ecosystems and sensitive species associated with these are likely to be affected by groundwater drawdown due to the project as well. Insufficient analysis of groundwater dependent ecosystems</p>
<b>Ind 340-12</b>	<p>Noise impacts of the project would cause stress and health impacts to the human and wildlife populations in the region. This was not adequately analyzed or addressed.</p>
<b>Ind 340-13</b>	<p>If the project goes forward, quality of life will be decreased for the entire community due to ongoing noise, reductions in air quality, increased traffic, decreased aesthetics, decreased water quality, well impacts, and etc. People who have the ability to do so will move away. Property values and associated property taxes going to the County will plummet. Small businesses will shutter. These impacts were not sufficiently addressed in the DEIR.</p>
<b>Ind 340-14</b>	<p>County taxpayers will end up footing the bill for all the road and traffic control improvements that will be needed if this project moves forward.</p>



**Ind 340-15**

The project would require more electrical grid capacity than is available, and its energy use would reverse all climate change mitigation that the County and region might be able to achieve if the project did not occur.

In summary, this project DEIR is inadequate and should not be approved.

Thank you for your time and consideration.

Sincerely,

Jennifer W. Burt, PhD  
Ecologist, Nevada County Resident





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## **INDIVIDUAL LETTER 340: JENNIFER BURT**

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### **Response to Comment Ind 340-1**

Comment noted.

### **Response to Comment Ind 340-2**

The commenter states that the DEIR is inadequate and intentionally misleading but provides no specifics or evidence. Therefore, a specific response is not possible. Comment noted.

### **Response to Comment Ind 340-3**

The analysis in the DEIR determined the project will have a significant and unavoidable aesthetics impact due to substantially degrading the existing visual character or quality of public views of the project sites or site surroundings, or conflict with applicable zoning and other regulations governing scenic quality. However, the DEIR determined that the project will have a less than significant impact on scenic vistas and would not create a new source of substantial light or glare which would adversely affect day of nighttime views in the area (see DEIR Impact 4.1-3).

Regarding air quality and asbestos: Please see Chapter 4.3 of the DEIR, Master Response 18 - Air Quality Thresholds, Master Response 23 - Adequacy of Asbestos Sampling, and Master Response 22 - Conservatism of Asbestos Assumptions. Additionally, please see the response to the referenced CEA comment letter (Group Letters 7 and 8).

### **Response to Comment Ind 340-4**

The project would not increase seismic activity, decrease geological stability, or the structure of the aquifer. Please see Chapter 4.6 of the DEIR, the NV5 memo attached to the FEIR as Appendix P, and Response to Comment Ind 248-13.

Project impacts to groundwater have been extensively analyzed in the DEIR. Please see Chapter 4.8 of the DEIR, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 340-5**

The commenter states the DEIR analysis of hazards and hazardous materials is grossly inadequate but provides no further information. Therefore, a further response is not possible.

Please see Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets.

### **Response to Comment Ind 340-6**

The commenter asserts that the groundwater model analysis does not consider an adequate baseline dataset and requests that the project monitor water levels for 10 years before commencing dewatering. With regard to the data used of the groundwater model, please see Chapter 4.8 of the DEIR and Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. The commenter does not provide a justification for the need for 10 years of baseline data and such extensive baseline data is not required to adequately assess the project's groundwater impacts.



### **Response to Comment Ind 340-7**

The commenter asserts that the groundwater monitoring should cover a larger area but does not explain why. The groundwater impact analysis and groundwater well monitoring plan were reviewed by the County's independent experts, who concurred with the impact conclusions and required mitigation, including the geographic scope of the monitoring area. Please see Chapter 4.8 of the DEIR and Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

### **Response to Comment Ind 340-8**

The applicant is already required to collect baseline well monitoring data and collect water level data throughout the project operations and is responsible for costs of well mitigation. Please see Mitigation Measures 4.8-2(a), 4.8-2(b), and 4.8-2(c) in the DEIR. Any financial assurances required for the mine are the responsibility of the mine operator.

### **Response to Comment Ind 340-9**

The commenter states that the groundwater should be completed for an area of 5 miles from the mineral rights boundary but provides no evidence why an arbitrary 5 miles from this boundary line is required. Please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

### **Response to Comment Ind 340-10**

The commenter states that many experts conclude that many more wells than those discussed in the DEIR would be significantly affected by the project but provides no evidence of these expert conclusions. Please see Master Response 13 - Historic Hydrogeologic Assessments, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The Well Mitigation Plan requires compensation for water charges. Please see Appendix K.9 of the DEIR.

The commenter states that water quality of NID potable water is lower than the water quality from domestic water wells, but provides no evidence to support this statement. Drinking water supplied to Nevada Irrigation District (NID) customers continues to meet and exceed state and federal public health standards, based on testing results that serve as the basis for the District's Water Quality Report. See NID water quality report at: <https://www.nidwater.com/files/1e68c2c9b/NID+WQR+2021.pdf>.

### **Response to Comment Ind 340-11**

Please see Master Response 33 - Groundwater Dependent Vegetation.



### **Response to Comment Ind 340-12**

Noise impacts to people have been evaluated in Chapter 4.10 of the DEIR and, except for construction of the water pipeline, have been found to be less than significant after mitigation. Noise impacts to wildlife is analyzed in the DEIR (see page 4.4-74 of the DEIR).

### **Response to Comment Ind 340-13**

The commenter states that certain impacts were not sufficiently addressed in the DEIR, but provides no evidence to support these claims. Please see Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts. Air quality impacts, traffic impacts, aesthetic impacts, water quality impacts and water supply impacts were all analyzed in the DEIR in Chapters 4.3, 4.12, 4.1, and 4.8, respectively.

### **Response to Comment Ind 340-14**

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

The applicant is also required to pay traffic improvement fees and fair share payments for various traffic improvements, including intersections. Please see Chapter 4.12 of the DEIR.

### **Response to Comment Ind 340-15**

PG&E provided a will serve letter for the project, PG&E has confirmed that there are electric facilities available to serve the proposed project in accordance with all applicable design standards, rules, and tariffs on file with the State of California Public Utilities Commission. The proposed project would not require or result in the relocation or construction of new electric power facilities. Please see page 4.11-35 of the DEIR.

Please also see Master Response 27 - Greenhouse Gas Thresholds, and Master Response 25 - Nevada County Energy Action Plan.



Individual Letter 341

**DO NOT !!**  
**I support re-opening the Idaho-Maryland Mine.**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible and innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JENNIFER DALMAU

Address 16425 COLFAX HIGHWAY GV ZIP 95945

Phone 530-205-8986

Email Address KARMENSGARDEN@GMAIL.COM

Ind 341-1



## **INDIVIDUAL LETTER 341: JENNIFER DALMAU**

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### **Response to Comment Ind 341-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 342**

**From:** [Jennifer Iams-McGuire](#)  
**To:** [hobosupervisors](#)  
**Subject:** no mine  
**Date:** Friday, February 18, 2022 9:15:30 AM

**Dist 4**

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Dear Board of Supervisors,

**Ind 342-1**

I am writing to contribute my voice to the thousands of local residents like myself who absolutely DO NOT support the opening of the Idaho-Maryland mine. When will we prioritize the health and well-being of the land, our environment, and the local residents versus the profits of a few? You have the opportunity to be truly forward thinking leaders, to end the legacy of toxic exploitation of our home. The benefits of re-opening the mine are insignificant compared to the less-addressed problems it will create.

**Ind 342-2**

Besides, what is the hurry? Why is our community scrambling to accommodate the desires of non-local interests when our long-term relationship with mining - past and future- has barely been addressed? If there is gold and profit to be extracted, it will still be there, years ahead, new decisions can be made when technology advances and values of self-preservation are prioritized. This is a watershed moment to make the right choice about our watershed! Poisoning our environment is not the right choice. Thank you for choosing long-term well-being and not accepting the smoke and mirrors "benefits" of a sketchy out of area self-serving corporation that cares nothing about our community. Don't get duped!

Thank you,

Jennifer Iams-McGuire

13222 Hidden Valley Rd.  
Grass Valley, CA 95949



## **INDIVIDUAL LETTER 342: JENNIFER IAMS-MCGUIRE**

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### **Response to Comment Ind 342-1**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 342-2**

Please see Master Responses 1, 2, and 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 343**

**From:** [Jennifer Kelly](#)  
**To:** [Matt Kelley](#); [Idaho MMFIR](#)  
**Subject:** Mine Concerns  
**Date:** Thursday, February 17, 2022 9:46:31 AM

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10688 James Lane

Nevada City

CA 95959

February 16<sup>th</sup>, 2022

Dear Mr. Kelley and Council Members,

I am making use of the period for public comment on the issue of reopening a local gold mine, to convey my concerns to you. There are so many obvious reasons why this should not be permitted it seems necessary to write a list rather than a letter.

This will not be in any particular order of importance; they are all important,

but as the massive DEIR is currently the center of attention, I will start with those.

**Ind 343-1**

**AIR QUALITY.** The months of huge fires all over the west, every year, mean the air quality in Grass Valley is deemed extremely hazardous for multiple days, unfit for anyone to breathe outside and extremely dangerous for those with existing respiratory problems & children. There can be no question that a mining operation that will include large trucks, laden with toxic rubble, driving along local roads to dump their cargo at a site quite close to the hospital will further pollute the air. Many of the particulates will be of an ideal size to be easily absorbed by human lungs. Unlike the fire season, there will be no respite from the truck season, they will roll all year, so our once pristine air will become a danger to everyone's health all the time. The human misery will be matched by increased costs for health care.

How can that be mitigated?

**Ind 343-2**

**NOISE.** The business of crushing rock into manageable sized pieces to be carried by even the largest truck must create noise at a decibel level harmful to the human ear, not to mention, sanity. The added noise of the trucks along their routes will be shared by a large percentage of the population. Our peaceful town will be burdened with the problems of an industrial zone.

**Ind 343-3**



	<p>How is that to be mitigated?</p>
<b>Ind 343-4</b>	<p><b>HAZARDOUS MATERIALS ON SITE &amp; IN TRANSIT</b></p> <p>The Union published an excellent article by Mr. Ray Bryars covering these concerns, in the Other Voices column of the paper of Feb. 16. I echo his worries and add to them the fear that a wildfire could cause a massive explosion, no matter how carefully these dangerous materials are stored.</p> <p>There is NO mitigation possible here.</p>
<b>Ind 343-5</b>	<p><b>WATER</b></p> <p>As the long drought is teaching us, water is our most precious resource. For this reason alone the mining operation should be firmly denied. No one knows, or can possibly study, the impact of releasing thousands of gallons of water into Wolf Creek. If this water is even slightly polluted it could have serious impacts on water systems &amp; agriculture far downstream. Since the geology of the area, already somewhat unstable due to many small faults, could well be impacted adversely by underground explosions, polluted water could reach far into the ground water, destroying wells and depriving us of an important part of our water supply. There is also a high risk that many local property owners could find their wells dried up or the water unfit for consumption.</p> <p>How can any of these terrible consequences be mitigated?</p>
<b>Ind 343-6</b>	<p><b>ADVERSE EFFECTS UPON WILDLIFE</b></p> <p>I have seen no studies about this but there are surely problems. Does Rise Gold plan to erect fences or barriers around all or part of the mine site? If so, how will they impact the life of our already endangered creatures? Apart from noise, which we know to be disruptive, especially at breeding times, there will be lights. How bright will they be &amp; how much of the night will they affect? Added traffic, especially heavy trucks will mean more roadkill. We are already finding traces of harmful chemicals in the eggs of songbirds. How much more dangerous will it become for them if our air is laden with mining toxics? They also face peril from polluted water.</p> <p>To mitigate any of this, lengthy studies would be needed.</p>
<b>Ind 343-7</b>	<p><b>TRAFFIC CONGESTION</b></p> <p>Despite being dismissed in the environmental report as a minor road of little significance, Brunswick is an important connector road in an area without many alternatives. Having a steady stream of large, heavily laden trucks constantly on the road will cause added congestion, inconvenience to local residents and, in the case of a need to evacuate the area quickly, will become a serious threat to a safe operation. They will also cause considerable wear and tear to the roads they use. Will Rise Gold be paying for the repairs and resurfacing needed?</p>



DRAIN ON ELECTRICAL POWER

**Ind 343-8**

As we are all well aware, our power supply is already in deep trouble. How will the requirements of a large mining operation be met without impacting local residents and businesses?

Even if mitigation of some of these issues IS possible. How would regulations be overseen, inspected & enforced? Who will recruit, train and pay all the staff necessary?

**Ind 343-9**

In addition to all the environmental concerns there are other problems. Mr. Mossman has a track record of irresponsibly managing mining projects, then walking away, declaring bankruptcy, leaving the local community to clear up & pay for the damage his operation has done. How can we ensure he will not treat Grass Valley in the same way?

In my opinion, approving this ill - considered project is tantamount to civic suicide. Who will ultimately accept responsibility for that?

Sincerely,

Jennifer P. Kelly





## **INDIVIDUAL LETTER 343: JENNIFER KELLY**

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### **Response to Comment Ind 343-1**

The commenter's opposition to the project is noted for the decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 343-2**

Air quality and health risk impacts from the project have been analyzed in the DEIR and have been found to be less than significant after mitigation. Please see Chapter 4.3 of the DEIR and Master Response 18 - Air Quality Thresholds.

### **Response to Comment Ind 343-3**

Crushers would be placed underground and not on the surface, which greatly reduces noise transmission (see page 3-25 of the DEIR). Noise from truck traffic has been analyzed in the DEIR and was determined to be less than significant after mitigation. Please see Chapter 4.10 of the DEIR.

### **Response to Comment Ind 343-4**

Wildfire is analyzed in Chapter 4.13 of the DEIR and hazards and hazardous materials are analyzed in Chapter 4.7 of the DEIR. Please also see Master Response 6 – Wildfire Impacts.

### **Response to Comment Ind 343-5**

The commenter asserts that the project would result in water supply and water quality impacts. Please see Chapter 4.8 of the DEIR regarding water supply and water quality impacts, as well as Master Response 16 - Drought and Climate Change, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek. Regarding the commenter's fault concerns, the magnitude of the mine rock excavation and placement is far smaller than the magnitude of the mass of bedrock underlying the site. The magnitude of the energy released during mining excavations by rock removal and rock placement is much smaller than the magnitude of energy activation required to trigger the release of a local pre-Holocene fault. No analysis was performed nor is necessary, as there is no potential for inducement of seismic activity on these faults from the proposed mining activity. Please see the NV5 Memo attached as Appendix P to the Final EIR.

### **Response to Comment Ind 343-6**

As stated on page 3-42 of the DEIR, all access locations at the project sites will be gated and secured. Additional fencing around the aboveground facilities may be installed as part of the proposed project, if deemed necessary for security and safety. Fencing would generally be placed on the publicly accessible borders of the site along E. Bennett Road and Brunswick Road, which are already partially fenced and in the areas of the two headframes and associated buildings. Fencing would exclude some wildlife from the operations areas of the proposed project. No fencing would be placed that would exclude wildlife from the South Fork of Wolf Creek.

Project lighting is discussed and analyzed in Chapter 4.1 of the DEIR, on pages 4.1-23 through 4.1-29 of the DEIR. As demonstrated therein, the proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The commenter states that additional traffic, especially heavy trucks, will lead to more roadkill. However, the commenter does not provide any evidence that weight of vehicles increases roadkill or that project traffic on existing roads would result in a significant impact to wildlife.



Noise impacts to wildlife is analyzed in the DEIR (see page 4.4-74 of the DEIR).

**Response to Comment Ind 343-7**

The commenter asserts that the project will result in traffic impacts and roadway wear. Traffic impacts have been evaluated in Chapter 4.12 of the DEIR. Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

With regard to evacuation, please see Master Response 5 - Evacuation Zones.

With regard to quality-of-life concerns, please see Master Response 1 - Non-EIR/Administrative Issues.

**Response to Comment Ind 343-8**

PG&E provided a will serve letter for the project, PG&E has confirmed that there are electric facilities available to serve the proposed project in accordance with all applicable design standards, rules, and tariffs on file with the State of California Public Utilities Commission. The proposed project would not require or result in the relocation or construction of new electric power facilities. Please see page 4.11-35 of the DEIR.

County, state, and federal regulations and mitigation measures are discussed in detail in the DEIR. Please also see Master Response 3 - Operator Responsibility.

**Response to Comment Ind 343-9**

Please see Master Response 3 - Operator Responsibility, and Master Response 1 - Non-EIR/Administrative Issues.



Individual Letter 344

Matt Kelley  
Nevada County Planning Department  
950 Maidu Avenue  
Suite 170 Nevada City, CA 95959



March 31, 2022

Dear Matt Kelley,

Ind 344-1

I have made my home in or nearby Nevada City for over 45 years. I am retired from Nevada County Library Service.

I have many concerns about how Benjamin Mossman does business and have addressed those concerns (with references) in previous emails to your department.

My main argument against the re-opening of the Idaho Maryland Mine is that our local tourist and visitor economy will be damaged by having an industrial mining operation so close to Grass Valley.

Ind 344-2

My specific feedback on the Draft Environmental Impact Report is as follows:

4.3.2 Existing Environmental Setting

"Ambient Air Quality Standards" - Our county already suffers from bad air quality and my concern is the lack of reference to addressing Asbestos being released. I would like to see an examination of the hazards of exposure and how to mitigate them.

Ind 344-3

\* I am not sure where I found this reference to our General Plan in the DEIR but it addresses my main argument that taxpayers may be "left holding the bag" as happened in Canada with the project overseen by Mr. Mossman:

**Policy 17.13 The County shall require satisfactory forms of accessible security, including irrevocable letters of credit, cash deposits, escrowed negotiable securities, or performance bonds, from all mining projects to cover all such damages which may stem from the projects.**

How much of a bond or guarantee would need to be in place to cover the very real possibility of damage, not only to our economy, but to the environment we all care for? My great-grandchildren are growing up here (!).

I have many other concerns regarding the possible reopening of the Idaho Maryland Mine – I have attempted to limit myself to the areas listed in the DEIR.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Long".

Jennifer Long 16665 Eden Ranch Road Nevada City, CA 95959 530-265-5059



## **INDIVIDUAL LETTER 344: JENNIFER LONG**

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### **Response to Comment Ind 344-1**

Please see Master Responses 1, 2, and 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 344-2**

Please see Master Responses 18, 22, and 23.

### **Response to Comment Ind 344-3**

Please see Master Responses 1 and 3.





**Individual Letter 345**

**From:** Jenny Todd <noelani.todd6226@gmail.com>  
**Sent:** Monday, April 4, 2022 2:29 PM  
**To:** Matt Kelley  
**Subject:** Letter for the 4pm deadline regarding Idaho-Maryland Mine

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**Matt Kelley Senior Planning Commissioner:**

Ind 345-1

My family and I are against the re-opening of the Idaho-Maryland mine, also known as the RISE Mine project. I have lived in Nevada county for 25 years and for 6 years, I attended UNR to complete my Bachelor's and Master's Degree in Biology. I have researched the Rise Mine website and have also researched the long-term devastation caused by deep-ground mining (even if it is termed as "green gold mining"). The negative, long-term environmental consequences outweigh the positive, short-term economic benefits. I believe that the RISE firm has appealed to the community with said economic benefits. There are examples from scientifically

Ind 345-2

researched and supported organizations, like [safewater.org](http://safewater.org), that show deep water mining does ultimately and greatly affect the water tables of the environment. If it is not our immediate water tables that are affected (at a more shallow fractured water tables), we will be taking from some neighboring location that can only be determined when the damage has been done. Mines in Arizona and Nevada can still be traced as sources draining water from areas of northern California even decades after the mines have ceased to function. If this is the case, and we deplete another community's water supply, I do not think it would be unlikely that it could be traced right back to our community and this mine. We would be





Ind 345-3

economically responsible for restoring their water. I also feel that the RISE website appeals to the community because of LIP SERVICE. The statements are not scientifically supported, or they have kept their sources a secret which contradicts the importance of having proper research to back facts up in the first place. RISE uses misleading verbiage and notions to suggest that they would positively benefit our community via employment opportunities. They have said nothing about how they would select any local employees. They have not said if these employees would be local because they would be temporarily moved to our community to work on the mind. They have claimed that they will provide 612 local jobs, then in the same paragraph they restated that 300 of these employees are implied local business hires because of the influx of cash flow at local businesses. This is a contradiction to what they have said about hiring locally. If these people already live locally then they already use community services. So where would this new revenue be coming from? They are either not hiring locally or they will not generate new revenue locally, which one is it? Let's not be hoodwinked by superficial jargon and deceptive information. There is a reason that a corporation with an unpleasant history (abandonment of job site cleanup and neglect for the environment) is trying to establish temporarily here, ruse our community, and expend our land. When things sound too good to be true, they typically are. There is no such thing as an environmentally friendly way to do a large mine operation. My last thought is in regard to the deep ore that RISE claims will be removed from the ground and used for development of land surrounding the mining site. The breaking up of this solid ore means crushing and releasing other contaminants in the ground. The solid ore that is broken up to be brought out of the deep mining site contains elements that when exposed to oxygen release contaminants into our environment. We might not see the

Ind 345-4



↑ effects of these harmful contaminants on a short-term time scale. Perhaps 10 years down the line, we will be experiencing irreparable damage visible by the absence of insect and animal life in the community. We will have to wonder how to explain to our children and their children why the land and water is unusable, or why it is hard to find insects or birds in our area. We will have to reflect on the forgotten few years of supposed financial gain and wonder if it was worth the tradeoff. The long-term effects of mining are what really need to be considered. For our community, reopening one of CA's largest gold mines could be the worst path possible. Thank you for your time,

Jennifer Todd, M.S.  
(530)477-1940



## **INDIVIDUAL LETTER 345: JENNIFER TODD**

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### **Response to Comment Ind 345-1**

This comment is introductory in nature. The commenter's opposition to the project is noted for the decisionmakers. The commenter also states the economic benefits of the project are outweighed by the environmental impacts. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 345-2**

The commenter states that the project will have an adverse effect on the water table. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 345-3**

The commenter states that the local employment benefits of the project are overstated and the commenter references the Project Applicant's prior mining project. The comment does not address the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 345-4**

The commenter states that the waste rock from the Idaho-Maryland Mine contains toxic substances and will have adverse impacts to biological resources on the surface. The commenter is referred to see Master Response 8 - Mine Waste Characterization. The commenter's opposition to the project is noted for the decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.





**Individual Letter 346**

**From:** Jennifer Weir <j.weir@me.com>  
**Sent:** Saturday, April 2, 2022 9:22 PM  
**To:** Idaho MMEIR  
**Subject:** Draft EIR for the reopening of the Idaho Maryland Mine

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Hello,

**Ind 346-1**

I am a resident at 13913 Gopher Hill Ct. Grass Valley. I would like to voice my objection to reopening the mine. My greatest oppositions lie with groundwater concerns due to dewatering the mine, to the backfilling of the mine, as well as, the increased traffic and noise associated with the number of trucks arriving and departing the facility.

**Ind 346-2**

We moved to this location specifically for the beauty, tranquility, and community feel of the Grass Valley/Nevada City area. I feel that these characteristics are under attack.

**Ind 346-3**

After reading the Draft EIR, I am not content with the remediation options provided. I do not have faith that RISE will meet its obligations to help residents with depleted wells. I do not have faith that RISE will be around to deal with the inevitable "unforeseen" environmental consequences that will result from this mining process. History is littered with stories of companies fighting resident claims, denying culpability, and going bankrupt leaving local, state and federal government agencies with the task of footing the bill and cleaning up the mess.

**Ind 346-4**

There are many unknowns that are likely unaccounted for. For example, the possible extended drought conditions in California and the impacts on groundwater in the area exacerbated by the RISE dewatering. Additionally, many of our local waste water treatment facilities have trouble dealing with dramatic inflows of water that occur with unexpected atmospheric river events. Will RISE's WTF be able to accommodate 50 year or 100 year rain events? Weather events in CA have become more extreme over my life in California.

**Ind 346-5**

This type of project should not be allowed in our area. We risk losing the character and aesthetic that draw thousands to our area every year. Large scale mining should remain part of our region's history but not a part of our present and future.

I don't know how anyone could read this report and say that this is a good idea for our community.

Sincerely,

Jennifer Weir



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## **INDIVIDUAL LETTER 346: JENNIFER WEIR**

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### **Response to Comment Ind 346-1**

Please see Master Response 1 – Non-EIR/Administrative Issues. In regard to groundwater, please see Master Responses 14 and 15. Traffic is addressed in Chapter 4.12 (Transportation) of the DEIR and noise is addressed in Chapter 4.10 (Noise and Vibration).

### **Response to Comment Ind 346-2**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 346-3**

The comment does not address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 346-4**

Please see Master Response 16 – Drought & Climate Change.

The proposed project includes a septic system and leach field to accommodate wastewater treatment. The DEIR, on page 4.6-49, notes that according to the septic system evaluation, a relatively large, acceptably permeable soil area has been identified within the proposed leach field area. The evaluation concludes that the project site is suited for a Pressure Dose sewage disposal system with a minimum of 1,935 lineal feet of leach line. A minimum 10,000-gallon septic pump tank with watertight risers over each lid and outlet effluent filter would be required. The pump tank would be oversized in order to accommodate for potential power loss, backups, and surge flows in the future. In addition, Mitigation Measure 4.6-4 requires that all drainage be diverted away from the septic tank, pump tank, and leach field.

### **Response to Comment Ind 346-5**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 347**

**From:** [Jere McGrew](#)  
**To:** [bdofsupervisors](#)  
**Subject:** Idaho Maryland Mine  
**Date:** Saturday, March 19, 2022 4:33:41 PM

Dist 1

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Dear Board of supervisor members,

My husband Paul and I strongly oppose reopening the Idaho Maryland Mine by the Rise Gold company!

We live off Banner Mountain road in an area that is included in the mineral rights map and Do Not want to endanger our water and air quality in any way.

The environmental impact report is just a series of assumptions, not guarantees that our precious natural resources will be unharmed. Any damage that occurs could be irreparable and how tragic that would be!

We passionately ask that you reject the Rise Gold plan to reopen the mine.

Paul and Jere McGrew

**Ind 347-1**



## **INDIVIDUAL LETTER 347: JERE MCGREW**

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### **Response to Comment Ind 347-1**

Please see Master Response 1 – Non-EIR/Administrative Issues. Water quality is addressed in Chapter 4.8 (Hydrology and Water Quality) of the DEIR. Air quality is addressed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 348**

**From:** Jeree Waller <jeree@careandprayer.com>  
**Sent:** Friday, April 1, 2022 7:44 AM  
**To:** Idaho MMEIR  
**Subject:** my public comment about mine

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As a 42 year resident of Nevada County, I am voicing my strong opinion that the mine should not be allowed to reopen. I have asthma, and our air quality is already very poor, so any added pollution is out of the question for myself and many, especially children. The noise, traffic, water usage and the fact that this company has already polluted a Native American site, are certainly other reasons to vote down the mine. Our Nisenan Rancheria should have a voice in shutting down this irresponsible move, as well.

Thank you for supporting the majority of local residents who do not want the Idaho Maryland Mine to reopen.

Blessings,

Jeree Waller  
17247 Patricia Way GV 95949

**Ind 348-1**



Virus-free. [www.avg.com](http://www.avg.com)



## **INDIVIDUAL LETTER 348: JEREE WALLER**

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### **Response to Comment Ind 348-1**

Please see Master Response 1. Air quality is addressed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR. Traffic is addressed in Chapter 4.12 (Transportation). Water is addressed in Chapter 4.11 (Public Services and Utilities). The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

In addition, as detailed in Chapter 4.5, Cultural and Tribal Cultural Resources, of the DEIR on page 4.5-21, InContext contacted Native American tribes with the potential to have knowledge of cultural resources in the project area, which included the Nevada City Rancheria Nisenan Tribe. Responses were not received from any of the tribes. Furthermore, on November 25, 2019, Nevada County sent project notification letters with offers to consult pursuant to Assembly Bill (AB) 52 to Native American tribes who had previously requested to be notified by the County. The tribes contacted by the County pursuant to AB 52 included the Nevada City Rancheria Nisenan Tribe. The Nevada City Rancheria Nisenan Tribe did not respond within the 30-day consultation period.

The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 349**

**From:** Jesse Mendez <builderjess@yahoo.com>  
**Sent:** Monday, April 4, 2022 11:13 AM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** Voting NO on reopening Idaho-Maryland mine

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Dear Board of Supervisors,  
I am encouraging our BOS to vote NO on reopening the Idaho-Maryland mine. I have many concerns, but I'll try to keep my email brief and will highlight just a few of the items I'm most concerned with.

**Ind 349-1**

1. Our mining history cannot be denied, but with a more populated area, and many residents dependent on well water, there is no way to guarantee that wells will not be compromised, either in performance, or quality. The San Juan Ridge mine is a prime example of a disaster that COULD happen. I understand that aquifer systems differ, but the one common trait is that there is no way to map the fractures that groundwater moves in, and as a result, dewatering can drain systems in unanticipated ways. It can also unlock impurities trapped in rocky areas, etc. While initial commitments to maintain well integrity are well meaning, there really is no way to guarantee that well water and quality of life for many residents will not be affected.

**Ind 349-2**

2. We're a tourist town, and as such we get a decent amount of traffic with good weather. The idea that trucks will be hauling material essentially 24 hours per day is not appealing. Impacting neighborhood traffic and busy residential and commercial areas, there is bound to be additional debris on our roadways and freeways. The constant hauling by semi trailers will also further degrade our roadways, and I imagine increased chipped and fractured front windshields from the dropped rock in roadways is to be expected. I don't see this as a positive trade off for a few jobs.

**Ind 349-3**

3. DEIR-As a draft report, we seem to be missing some key information, one of which is utilizing the Centennial site that is planned for additional mine waste. How is the existing site to be cleaned up and maintained? I also don't understand how the ability to "blast" essentially 24 hours a day is not going to impact established residential areas. We are still a small town, so any active mining claim that incorporates old school hard rock mining is bound to be disruptive to established communities. There is no way around it. It will be noisy and messy, and with seemingly no hard guidelines on hours/restrictions, it is a nightmare waiting to happen, being allowed to happen.

**Ind 349-4**

4. The amount of released water into Wolf creek is sizeable. I don't believe the Impact Report can accurately predict how this already fragile ecosystem and watershed will be affected. With any sustainable release, existing biology will be affected for years to come, and estimated flows are just that, estimates. Until water is pumped from underground mines, there is no way to know just how much flow the creek will experience. With help from the community, the creek is looking healthier than it has in years.

**Ind 349-5**

5. Management team has poor track history- every situation is different, but what is not different is whether or not a business model really works and is environmentally responsible. Ben Mossman and his team do not have a proven track record, and in fact, their record is one of environmental and community failure. Knowing what he has left in other areas is fair warning to what he could leave for Grass Valley.

**Ind 349-6**

I would expect our BOS for vote NO on this matter, placing priority on what is best for our community for sustained long term health of our residents and town.  
Sincerely,

Jesse J. Mendez  
Grass Valley Resident  
461 Brighton Street





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## **INDIVIDUAL LETTER 349: JESSE MENDEZ**

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### **Response to Comment Ind 349-1**

The commenter urges the Nevada County Board of Supervisors to not approve the project. The commenter is concerned about the project's impacts to groundwater and states that it is not possible to anticipate the impacts from dewatering the Idaho-Maryland Mine. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Regarding impacts to private wells, the DEIR states that impacts to groundwater supplies would be less than significant after mitigation (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 349-2**

The commenter is concerned about the project's traffic-related impacts and states that the roadways can already become congested due to tourism. The commenter also states that the project's truck traffic will degrade the roadways. The DEIR discusses traffic impacts in Chapter 4.12 and found that the impacts would be less than significant after mitigation, with the exception that the impacts to the intersections at SR 174/Brunswick Road and Brunswick Road/Sutton Way would be significant and unavoidable even after implementation of mitigation. Regarding damages to the pavement from project traffic, Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between Project Driveway and Brunswick Road. Lastly, project trucks would not be hauling 24 hours per day. (DEIR, Table 3-7)

### **Response to Comment Ind 349-3**

The commenter states that DEIR is lacking a discussion of the Centennial Industrial Site cleanup. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA. The commenter also states that blasting 24 hours per day will be disruptive to residences nearby. The DEIR analyzed underground blasting for the project and found that the noise from blasting would fall below applicable criteria. (DEIR, p.4.10-45.) Regarding groundborne vibrations from blasting, the DEIR found that impacts would be less than significant after mitigation. The commenter is also referred to Master Response 7 - Location of Future Mining Areas. Regarding the assertion that blasting would occur 24 hours per day, blasting activities are proposed to take place twice daily, with blasting between shifts at 7AM and 7PM, with 3 to 4 drift rounds blasted every 12 hours between shift changes and longhole blasts of approximately 3,300 tons of rock taking place once every 3-4 days. (DEIR, p. 4.7-28.) Notwithstanding the above well-supported conclusions in the DEIR, mitigation measures (4.10-3 and 4.10-4) have been included requiring the applicant to perform robust noise and vibration monitoring programs throughout the life of the project.

### **Response to Comment Ind 349-4**

The commenter is concerned about the impacts to South Fork Wolf Creek from the discharge of treated water. The commenter is referred to Master Response 36 - Flows in South Fork Wolf Creek.



**Response to Comment Ind 349-5**

This comment references the Project Applicant's prior mining project and does not pertain to the adequacy of the DEIR. The commenter is referred to Master Response 3 - Operator Responsibility.

**Response to Comment Ind 349-6**

The commenter reiterates opposition to the project. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.



**Individual Letter 350**

**From:** Jesse Nugent <jessenugent@gmail.com>  
**Sent:** Monday, April 4, 2022 11:53 AM  
**To:** Idaho MMEIR  
**Subject:** Comment on proposed mine operations

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**Ind 350-1**

There are too many risks and compromises to the ecosystem, wildlife, and community for this mine re-opening to be beneficial. There is no way to guarantee that many mitigation measures will actually serve to do anything other than act as "damage control".

**Ind 350-2**

There are many alarming changes proposed in this seemingly endless list of compromises to be passed on to the community. The owner of this mining company (Ben Mossman) downplays many key issues and claims on a recent news story that only "up to 7 wells could be effected". His solution is to supply treated NID water to these properties. In reality, we will be sacrificing hundreds of millions of gallons of groundwater during a drought. It's not possible to fully understand how this will effect other wells or nearby portions of the watershed. The one thing that is known is that it will not benefit the community/residents, wildlife, or ecosystem to lose that water or stir things up underground.

**Ind 350-3**

No amount of mitigation measures will compensate for the amount of pollution, traffic, noise, and other unpleasant side effects an operation like this is going to bring with it.

**Ind 350-4**

You don't have to look far to find that Ben Mossman has a troubled past. He has a history of illegal practices and negligence that have caused damages to ecosystems that can't be repaired-  
<https://www.cbc.ca/news/canada/british-columbia/b-c-s-high-court-upholds-new-trial-for-two-managers-after-spill-at-mine-1.5784666>

**Ind 350-5**

Since the gold rush, the community has become very agricultural and this mine will harm the farming industry. There is no good reason to dump ground water and create exponentially more green house gasses in our area especially during a drought. What happens underground effects what's above as well. We are very lucky the town didnt go up in smoke last year during the river fire...

I hope this decision is made responsibly for the longevity of grass valley and future generations.

Jesse Nugent



## **INDIVIDUAL LETTER 350: JESSE NUGENT**

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### **Response to Comment Ind 350-1**

Please see Master Responses 1.

The comment expresses a general opinion that the mitigation measures set forth in the DEIR serve more as “damage control,” than as tangible steps required of the proposed project to reduce the severity level of potential impacts identified in the DEIR, but does not provide specific examples that would allow for a detailed response. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 350-2**

Please see Master Responses 14, 15, and 16. The commenter expresses general concerns regarding groundwater but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 350-3**

The comment expresses a general opinion that the mitigation measures set forth in the DEIR will not “compensate” for potential impacts, but does not provide specific examples that would allow for a detailed response. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 350-4**

Please see Master Response 3 – Operator Responsibility.

### **Response to Comment Ind 350-5**

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1.



**Individual Letter 351**

**From:** [Jessica Higgins](#)  
**To:** [hckofsupervisors](#)  
**Subject:** letter from district IV  
**Date:** Monday, March 14, 2022 8:35:05 PM

Dist 4

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**Ind 351-1**

March 14th 2022  
To Whom It May Concern,

My name is Jessica Higgins and I live in District IV with my 8 year old daughter and my husband. My daughter, Lili, and I are writing this letter together to share our stance on the potential reopening of the Idaho Maryland Mine. We love living here and care deeply for our community. I work at Sierra Nevada Memorial Hospital as a nurse and my daughter attends Grass Valley Charter School. We are heartbroken thinking that a company like Gold Rise might have a chance to exploit this precious place we call home.

We are strongly opposed to the reopening of the mine for many reasons.

**Ind 351-2**

Reopening the mine threatens hundreds of private wells.

**Ind 351-3**

The expected energy draw of the mine operations would put a serious strain on our power grid and move us further away from environmentally responsible power use.

**Ind 351-4**

The water that would be removed from the flooded mine shafts is polluted and when released into the streams and creeks that make up our watersheds, it would decimate the flora and fauna of that precious ecosystem.

**Ind 351-5**

The actual mine work will be loud and detrimental to the people who live in the area.

**Ind 351-6**

The increased traffic of heavy vehicles on our roads is also undesirable.

**Ind 351-7**

There are so many better ways to boost our economy. Take for example the mountain bike trails we have added and the huge boost to the local economy that tourist attraction has provided. People come into our community and spend money locally. Or, as another example, look at the pre-pandemic impact of hosting the Wild and Scenic Film Festival here. Let's work on healthy, sustainable ways to draw money into our economy. The mine will provide few jobs and the wealth generated will mostly be going to a foreign company.

Please, we can do better than this! Put your local constituents and our precious environment first. Vote no on the reopening of Idaho Maryland Mine.

Thank you for your time,  
Jessica Higgins, RN BSN  
and  
Lili Doleman





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## **INDIVIDUAL LETTER 351: JESSICA HIGGINS**

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### **Response to Comment Ind 351-1**

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 351-2**

Please see Master Responses 14 and 15.

### **Response to Comment Ind 351-3**

Please see the analysis under Impact 4.3-4, which evaluates the proposed project's potential to result in inefficient or wasteful use of energy and starts on page 4.3-86 of the DEIR. Based on the incorporation of various measures, including the applicant's proposed APM-AQ-1 (Exhaust Emission Control) and Tier 4 engines as required by Mitigation Measure 4.3-1(b), the DEIR concludes that the proposed project would not result in an inefficient, wasteful, and unnecessary consumption of energy, and a less-than-significant impact would occur.

### **Response to Comment Ind 351-4**

Please see Master Response 35 – Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 351-5**

Noise is addressed in Chapter 4.10 (Noise and Vibration) of the DEIR. The commenter expresses general concerns regarding noise but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 351-6**

Traffic is addressed in Chapter 4.12 (Transportation) of the DEIR. The commenter expresses general concerns regarding traffic but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 351-7**

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 352

**DO NOT**  
**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jill Francis  
Address 218 Rhode Island St ZIP 95943  
Phone \_\_\_\_\_  
Email Address \_\_\_\_\_

Ind 352-1



## **INDIVIDUAL LETTER 352: JILL FRANCIS**

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### **Response to Comment Ind 352-1**

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 353**

2.7

TO: Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

April 2, 2023

[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

FROM: Jim Bair, Scientist (ret); Business Owner  
128 Sierra Blanca Ct.  
Grass Valley, CA 95945

**Subject: Idaho-Maryland Gold Mine Project, DEIR Comment on Appendix E2: Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan**

**Introduction**

The purpose of this Comment on the DEIR is to show that asbestos air pollution cannot be mitigated to safe levels as claimed by the DEIR. The inadequacy of asbestos mitigation results from the fundamental nature of the project: it is not feasible to contain asbestos with the huge above ground transporting and dumping (1500 tons a day) of asbestos containing material (defined as 0.25% or greater by California Air Resources Board (CARB)). See the DEIR body Page 4.3-8 for a description).

The DEIR does describe asbestos pollution to be significant. It states upfront that "Potential cancer risk, as well as chronic and acute health risks would be less than significant without mitigation. However, implementation of MM-AQ-2 would further reduce health risk. Also, since asbestos was found in lab samples from the mine, an Asbestos Dust Mitigation Plan (MM-AQ-3) would be required to limit potential exposure. (page v, Air Quality and Greenhouse Gas Emissions Analysis Technical Report).

However, the mitigation proposals and the referenced CA code make an implicit and profound assumption that asbestos is dust which it is not. As documented below, asbestos fibers may be in dust, but dust particles are much larger and therefore visible. While dust may be manageable, asbestos fibers (ave. .5 microns) become fugitive and airborne to be carried many miles from origination. Asbestos pollution is comparable to wildfire smoke which contains gaseous and particulate matter.

Regardless of issue of dust (versus smoke), the DEIR does not even contain an Asbestos Dust Mitigation Plan (ADMP). Therefore, this vital part of mitigation cannot be used to determine DEIR adequacy. The DEIR cannot be certified unless a ADMP is reviewed and approved. Quote: "Prior to the initiation of any clearing, grading, or construction activities, Rise Grass Valley Inc. [sic] shall submit an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD)." It is not consistent with the intent of CEQA to use a report or document that is not available as an impact mitigation.

Ind 353-1





2.7

Ind 353-2

Furthermore, the portion of Mine tailings intended to be used as engineered fill is uncertain because fill contaminated by asbestos is prohibited when one of the uses would be in road construction such as surfacing. The CA law (California Air Resources Board, CARB) is unambiguous: "...no person shall use, apply, sell, supply, or offer for sale or supply any restricted material (as defined in subdivision (i)(20)) for surfacing, unless it has been tested using an approved asbestos bulk test method and determined to have an asbestos content that is less than 0.25 percent."<sup>1</sup> The Rise Gold Mine processing of aggregate, "engineered fill", would not qualify for a CARB exemption. (c.f. ref. i)

Ind 353-3

**General Comments on DEIR Appendix E2, ASUR Management Plan**

**Section 1.0** recognizes the inevitable introduction of asbestos into the air by stating that this plan will only "...**minimize** the potential for public exposure to airborne asbestos from the Project..." not eliminate it. (p.1) The section further states that it includes "... testing methods that Rise will implement throughout the life of the project..." which is 80 years. I note below that testing is and will be extremely constrained because it is dependent upon a lengthy, complex process involving small samples of rock that will have to be shipped to testing companies such as those in Berkley and Oakland unless an electron microscope lab is set up on site (see below).

Ind 353-4

**Section 4.0** Project Overview represents a clear description of the Idaho-Maryland Mine Project. It is a matter-of-fact depiction of a project so massive the average person including non-expert government officials will have a hard time comprehending the enormity. I judge the representation of the sheer magnitude of the project to be inadequate. As stated, quote, "Gold mineralization production through tunneling and long-hole blasting produces 1,000 tons per day (365,000 tons per year) of mineralized material. Approximately 50 percent of the mineralization [see note below] will be returned to the underground mine as backfill after processing and the remainder of the sand tailings will be used for engineered fill." Blasting will continue 24 hrs. per day, 7 days a week under 2,585 acres, roughly 2/3 the size of Grass Valley.

Ongoing explosions are to occur as little as 200 ft. below inhabited areas, in multiple areas simultaneously. Quote: "The tunnels are constructed in 10-foot advances per blast (a "round"). Parallel holes are drilled into the rock face, loaded with explosives, and then detonated to fragment the rock. The broken rock is moved to the surface, the tunnel is supported with rock bolts and screen, and then the process starts again to continue advancing the tunnel. **A number of tunnels will be under construction throughout the mine area at all times during the life of the mine.**" (p5) [bold added]. The project should be evaluated by comparison to other massive extraction projects in populated areas a number of which have failed. **The DEIR**





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↑ **should provide evidence by example that no residential areas have been rendered uninhabitable.**

**Section 5.0: Asbestos measurement** is detailed in the ASUR Plan (ref. source 4 below, Idaho-Maryland Exploration Asbestos Sampling... 8.1). Asbestos fibers are very small (often <0.0005 mm in diameter) [0.5 microns]. In order to quantify the asbestos concentration, a sample has to be studied at 1000–2000 times magnification. An electron microscope has to be equipped with an “energy dispersive sector”, which allows the chemical composition of the fibers to be determined.<sup>ii</sup>

Ind 353-5

While the ASUR Plan states that asbestos analytical methods can detect fibers “0.0002 microns” in diameter (p. 7; see Note 9 below), **the Plan does not address the measurement of airborne fibers.** This is an indication of an inadequate treatment of asbestos fiber size which greatly influences asbestos motility, and consequently public health in the populated area. The size of asbestos fibers predicts airborne movement. Fibers as small as a micron (1 millionth of a meter), are extremely difficult to measure and even more difficult to manage in a natural outdoor environment. (1mm = 1000 microns).

The DEIR does not explain how fibers of this size can be detected on site during above ground processing (planned movement of 3,000,000 lbs. of rock a day). The ASUR Plan indicates there will be testing, perhaps hourly, for asbestos – this would require that a lab including an electron microscope be on site. Note that the Plan equivocates by stating, “Sampling and analytical testing will be done on or off-site by trained and qualified persons under the direction of a State Licensed Geologist.” (p. 13) Until an adequate testing plan for asbestos during rock processing (crushing, shafting, dumping, loading, etc.) is submitted and approved, this air quality pollution impact from asbestos is Significant and Unavoidable.

Ind 353-6

Cancer potency is critical to assessing air pollution impact. But the ASUR Plan states that “TEM [Transmission Electron Microscopy] is the preferred analytical method for outdoor asbestos samples because of its ability to detect small fibers (greater than or equal to 0.0002 microns in diameter) and to distinguish between asbestos fibers and non-asbestos fibers. The term “TEM structures” is often used to describe asbestos fibers detected by this method. TEM is the method recommended by the California Office of Environmental Health Hazard Assessment (OEHHA). However, **TEM measurements cannot be directly related to the cancer potency** factors because the studies upon which OEHHA’s risk assessment was based used PCM analysis. Thus, the TEM measurements must be converted to PCM-equivalent units (OEHHA 2015).” [bolding added]

Ind 353-7

↓ The 2002-07-29 Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations (June 3, 2015) Final Regulation Order for toxic control is copied into the ASUR Plan Appendix B. While the code requires extensive measures to



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control asbestos, we cannot find any commitment or plan in the DEIR to implement these measures, or CA agencies that have the resources/manpower for enforcement, e.g., Air Pollution Control Officers (APCO). The DEIR must be evaluated with the reality of comprised enforcement (reported to be 3 Officers for the entire air district).

**Detailed Comments on Asbestos Measurement**

Ind 353-8

1. Asbestos measurement levels are the basis of proposed mitigation and significance. But asbestos measurements are from underground core samples described in the ASUR Plan -- the relationship between asbestos found in rock samples and how much becomes airborne must be described. Note that despite the unacceptable sample size, several samples were positive: "Actinolite Asbestos Detected, Non-Regulated Amphibole (5 Hornblende) Observed. Concentration in Millions of Fibers per gram: 29 actinolite fibers >5um in length. Possible contamination."

Ind 353-9

2. Samples have been taken in known vein areas with preference to existing tunnels/exploration (see maps in ASUR Plan Appendix C). Rise Gold Inc. has no constraints on the location of new tunnels in the Mineral Rights area. There is a huge amount of lithogenic variability in the area, e.g., serpentine rock (high asbestos likelihood) is not in the sample set, but present in the Mineral Rights area. **Additional core holes and samples are necessary to project asbestos quantity in extracted rock.**

Ind 353-10

Current testing samples are not even close to representative. The mineral rights area of 2585 acres is represented by 19 exploration drill holes, or 1 drill hole per 136 acres, from which 40 to 42 samples are taken (see tables in ASUR Plan Appendix C) beginning downward at 200 ft depth. That is less than .02 samples per acre ( 2 100ths of one sample per acre) equal to 1 sample per 65 acres. **A representative sampling of the mineral rights area must be described and committed to in the DEIR.**

Ind 353-11

3. Section 4 is history based, but immediately thereafter in Section 5 there's a discounting of the serpentine areas, even though serpentine rock has indigenous asbestos, and then a statement that there are 19 sample drillings. The next paragraph states that there were 43 drill core samples. Currently, there is no explanation of how likely asbestos is to be in rock *adjacent/proximal* to the samples. There needs to be a description in the DEIR of the sampling location regimen and generalization process that was used.

Ind 353-12

4. Section 5.0 (p.7) states, in a circumspect way, that the inappropriate measurement technology, PCM, was used initially and then the more sensitive technology, TEM, was used. TEM was then declared as the incorrect methodology for the California Office of Environmental Health Hazard Assessment (OEHHA). "In 2021, Rise requested the 40 samples previously





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submitted to be reanalyzed using the TEM method." Then the Plan says, "**TEM measurements cannot be directly related to the cancer potency factors because the studies upon which OEHHA's risk assessment was based used PCM analysis.**" This is simply confusing and obfuscating in complexity and there's no further discussion of cancer potency.

A decision was made based on regulation and the type of measurement, TEM or PCM, to do both, although Section 6.0., p.8, repeats the plan to convert TEM to PCM.

Ind 353-13

6. Further ambiguity is evidenced by unclear description of the effect of asbestos presence in either gold ore or barren rock. If planned barren rock tunneling is projected to be Asbestos Containing Material, a location for underground disposal will be found. If gold ore has asbestos, "An operational plan **will be** prepared and approved to ensure that all sand tailings derived from processing of gold mineralization which is projected to be Asbestos Containing Material will not be trucked for use as engineered fill." In other words, the detection of asbestos in rock would result in useless gold ore or barren rock? The plan does state: "Barren rock will be co-disposed with cemented paste backfill or placed (uncemented) in abandoned tunnels."

So, between asbestos-contaminated gold ore and barren rock, will there still be enough rock to warrant the massive trucking of 1000 tons a day to the Centennial dump site and beyond? This is not a facetious question and must be answered in the DEIR by modifying Section 6.0, item 7 and including the *Surfacing in Engineered Fill Placement Plan* in the DEIR. DEIR cannot be approved until that operational plan is completed. "An operational plan **will be** prepared and approved to ensure that all sand tailings derived from processing of gold mineralization which is projected to be Asbestos Containing Material will be used for underground cemented paste backfill and not for Engineered Fill." (p.7) [bold added]

Ind 353-14

7. Despite the difficult detection of asbestos in core samples leading to detection of significant presence in approximately 32% of the core samples, there is no established method to determine how much will be airborne. **We cannot find any evidence that underground/in solid/gravel rock sampling is a valid basis for generalizing to airborne asbestos presence.**

Ind 353-15

**Conclusion:**

Asbestos creates a risk for Rise Gold Inc. such that finding all the dangerous asbestos is too problematic and expensive for mine operation. Common business sense, especially in such a highly leveraged operation, would minimize sampling of the **3,000,000 pounds of rock moved per day, thus contributing to lethal air pollution from asbestos.** One can only imagine the number of licensed geologists chasing 3 million pounds of rock daily only to have to transport it to Berkeley/Oakland for TEM or PCM testing or both.



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The sampling methodology is inadequate to predict the quantity of asbestos in 547,500 tons of rock removed from the earth every year, **or the quantity of asbestos that will become airborne**. The fact that asbestos was found in a number of core samples proves it is present. Moreover, there is too high a probability that there will be sufficient airborne asbestos to cause regional contamination leading to sickness and increased mortality.

Research concludes that asbestos fibers from mining are small enough to spread widely when airborne and penetrate deeply into the population's lungs. <sup>21</sup>

Respectfully submitted,



James Bair, Scientist at Stanford, Bell-Northern Research, and Rome Research Center (USAF)

Ind 353-16

**Notes:**

1. "Mineralization", has a different meaning in science. **"Mineralization is the process by which chemicals present in organic matter are decomposed or oxidized into easily available forms to plants."** In the DEIR **Mineralization** denotes rock that contains gold ore. **Mineralization should be used to denote extraction of minerals using a chemical process.** For mineralized rock to be returned to the tunnels, it must be chemically processed to separate the gold, or be unusable because of excessive amounts of toxins like asbestos.

Ind 353-17

2. Quote from DEIR body, **Page 4.3-80: setting "minimize" as the standard -- it should be quantified**

"Asbestos: With regard to potential asbestos emissions from mining, Rise Grass Valley Inc. would be required to comply with applicable regulations, including those established by the MSHA and CARB, that limit potential exposure for workers. Further, as described in APM-AQ-3, the project would include implementation of an ASUR Plan that has been designed to **minimize** asbestos in the engineered fill produced by the project, as well as asbestos fibers generated from underground mining exhausting to the surface. Finally, pursuant to the CARB ATCM for Construction, Grading, Quarrying and Surface Mining Operations, an ADMP is required to be submitted to the NSAQMD for any project with greater than one acre of surface disturbance if any portion of the area to be disturbed is mapped as having serpentine or ultramafic rock or if any portion of the area to be disturbed has naturally-occurring asbestos, serpentine or ultramafic rock as determined





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by the owner/operator or the Air Pollution Control Officer. Because asbestos was found to be present in some of the underground mining material samples that Rise Grass Valley Inc. sent for laboratory analysis,41 **an ADMP is required to be implemented to reduce potential asbestos exposure and protect public health.** [bold added]  
[Note reference: "Samples containing naturally-occurring asbestos were from underground rock only; naturally-occurring asbestos is not known to outcrop at the surface of the Brunswick Industrial Site or Centennial Industrial Site." Repeat of 4.3-2 Asbestos Dust Mitigation Plan from DEIR body; See Page 4.3-82]

Ind 353-18

3. Paving with engineered fill is illegal; Air Pollution Control Officer (APCO) warning sign:

◆**WARNING! This material may contain asbestos.**

It is unlawful to use this material for surfacing or any application in which it would remain exposed and subject to possible disturbances.

Extreme care should be taken when handling this material to minimize the generation of dust.◆

4. See *Overview of the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) | US EPA*  
<https://www.sciencedirect.com/search?qs=asbestos%20and%20gold%20mining>

5. Brooke T. Mossman. *Mechanistic in vitro studies: What they have told us about carcinogenic properties of elongated mineral particles (EMPs) [i.e. asbestos]* **Toxicology and Applied Pharmacology** Volume 361, 15 December 2018, Pages 62-67. "These studies demonstrated a spectrum of pre-neoplastic changes, including hyperplasia and squamous metaplasia, in response to long (>5 µm in length) needlelike EMPs [i.e. asbestos]."

6. David H. Garabrant and Susan T. Pastula. *A comparison of asbestos fiber potency and elongate mineral particle (EMP) potency for mesothelioma in humans.* **Toxicology and Applied Pharmacology.** 2 August 2018.

7. *Asbestos-Related Disease.* Patti Kratzke MN, RN, CC, Ma and Robert A. Kratzke MD, **Journal of Radiology Nursing** Volume 37, Issue 1, March 2018, Pages 21-26. "Asbestos exposure results in a spectrum of respiratory diseases. Both mesothelioma and lung cancer are directly associated with exposure to asbestos usually after a long latency period, whereas other noncancerous diseases such as asbestosis result in crippling debility..."

Ind 353-19

8. **Credibility:** The DEIR is substantially copied from previous consultant contracts is evidenced by a reference in Table 4.3-3 to Portola Valley in the Bay area: "Fine Particulate Matter (PM2.5) Annual Mean Attainment (with the exception of the Portola Valley) Attainment (with the exception of the **Portola Valley**)" [a town in the CA Bay Area].





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Ind 353-20

9. The report should clarify if 0.0002 microns should be 0.0002 mm, since measuring the size of atomic particles is not relevant. (p. 7): “TEM is the preferred analytical method for outdoor asbestos samples because of its ability to detect small fibers (greater than or equal to 0.0002 microns in diameter) ...”

#### Specific DEIR Documents Analyzed:

**DEIR Source 1:** DEIR

[https://www.mynevadacounty.com/DocumentCenter/View/41650/Idaho-Maryland-Mine-Project-Draft-EIR\\_Volume-I-Draft-EIR-Chapters-1-8](https://www.mynevadacounty.com/DocumentCenter/View/41650/Idaho-Maryland-Mine-Project-Draft-EIR_Volume-I-Draft-EIR-Chapters-1-8)

**DEIR Source 2:** DEIR Appendix -E2, Idaho-Maryland Mine Project: Asbestos, Serpentine, and Ultramafic Rock (ASUR) Management Plan , Rise Grass Valley Inc. November 2021.

[https://www.mynevadacounty.com/DocumentCenter/View/41621/Appendix-E2\\_ASUR-Plan](https://www.mynevadacounty.com/DocumentCenter/View/41621/Appendix-E2_ASUR-Plan)

**DEIR Source 3:** Air Quality and Greenhouse Gas Emissions Analysis Technical Report for the Idaho-Maryland Mine Project Nevada County, California Prepared for: Rise Grass Valley Inc. PO Box 271 Grass Valley, California 95945 Prepared by: 1102 R Street Sacramento, California 95811 Contact: Matthew Morales NOVEMBER 2021.

**DEIR Source 4:** ASUR Management Plan APPENDIX C, Idaho-Maryland Exploration Asbestos Sampling, DEIR Appendix -E2, Idaho-Maryland Mine Project: Asbestos, Serpentine, and Ultramafic Rock (ASUR) Management Plan , Rise Grass Valley Inc. November 2021.

#### References

<sup>i</sup> <https://ww2.arb.ca.gov/sites/default/files/classic/toxics/atcm/asbeatcm.htm>

<sup>ii</sup> Hwang CY. *Size and shape of airborne asbestos fibres in mines and mills.* **Occupational and Environmental Medicine** 1983;**40**:273-279.

<sup>iii</sup> G. Gibbs, C. Hwang. *Dimensions of airborne asbestos fibres.* 1980; **Environmental Science, IARC scientific publications.** “Systematic measurements were made of the dimensions of fibres found in the air in mines and mills for crocidolite, amosite and chrysotile. Samples were collected on membrane filters and examined in light, transmission electron and scanning electron microscopes. The proportion of short fibres was shown to decrease with extent of processing, especially for amosite. No airborne fibres had a diameter greater than 3 micrometers, and all would therefore be capable of reaching the pulmonary alveoli.”



## INDIVIDUAL LETTER 353: JIM BAIR

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### Response to Comment Ind 353-1

The commenter suggests that the asbestos mitigation, including the Asbestos Dust Mitigation Plan (ADMP), is insufficient to mitigate asbestos impacts. Prior to underground gold mining, intensive planning efforts will be required to meet state and federal regulations and achieve safety, environmental, and economic goals. Underground mine planning includes exploratory drilling, geologic mapping, material logging, and testing. These same processes also ensure future mining operations avoid and manage rock types that may contain naturally occurring asbestos. Please see Section 6.0 of the ASUR Plan (Appendix E.2 of the DEIR). The Health Risk Assessment (included in Appendix E.1 of the DEIR) is based on conservative assumptions, as described in Master Response 22 – Conservatism used for Asbestos Assessment. Nevertheless, the DEIR concluded that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to the Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP.

Various project activities create dust particles which are assumed to contain naturally occurring asbestos for the purposes of the Health Risk Assessment. These naturally occurring asbestos fibers are minerals contained within the rock and must be liberated and become airborne to pose a public health risk. The Health Risk Assessment for the project assumes that every asbestos structure present in dust (coarse particulate matter, PM<sub>10</sub>) is liberated and would be counted as 1 structure in a given air mass. This is a very conservative assumption as a large proportion of asbestos structures would not be liberated and would be enclosed in dust particles. These enclosed fibers would not be counted as asbestos in an air sample because they have no effect on human health. Please see Master Response 22 – Conservatism used for Asbestos Assessment.

The commenter suggests that management of dust does not result in the management of asbestos fibers and that any asbestos fibers in the air would be similar in geographical distribution as wildfire smoke. These opinions and concerns expressed by the commenter are noted by the County. However, substantiation of these assertions is not presented in the comment letter. It appears that the commenter does not understand the nature of naturally occurring asbestos fibers, which are part of the mineral composition of certain rocks. While the air quality analysis assumes a conservative level of asbestos fiber liberation into air (see Master Response 22 – Conservatism used for Asbestos Assessment), most asbestos fibers present in rocks would not be liberated from either the rock or dust particles created from the rocks and would not be counted as asbestos in an air sample because they have no effect on human health. Additionally, as asbestos fibers are considered a subset of coarse particulate matter, reduction in dust concentration at a receptor location would result in a reduction of asbestos at the receptor location with a corresponding reduction in calculated health risk.

Finally, the commenter believes that the ADMP must be reviewed and approved during the CEQA process. However, the commenter is incorrect, as ADMPs are typically prepared and approved after the CEQA process is complete. CEQA regulations state that compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (see CCR



§ 15126.4.) Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to NSAQMD for review and approval. The ADMP has minimum requirements as described in the mitigation measure. The requirements for the ADMP are regulated by the Asbestos ATCM for Construction, Grading, Quarrying and Surface Mining Operations [17 CCR 93105]). Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

### **Response to Comment Ind 353-2**

The commenter refers to the requirements of the Asbestos ATCM for Surfacing. All materials would be tested in accordance with the Asbestos ATCM for Surfacing. Materials with detectable asbestos by PLM testing would not be used for Surfacing (see page 4.3-61 of the DEIR).

### **Response to Comment Ind 353-3**

The commenter believes that asbestos testing proposed for the project will constrain the project unless an electron microscope lab is set up on site. Two methods of asbestos testing are required under the ASUR Plan. Polarized Light Microscopy (PLM) testing is required to comply with the Asbestos ATCM for Surfacing and trucks may not transport material without a receipt based on the PLM results. Any materials with detectable asbestos would not be allowed to be used for surfacing. As discussed on page 4.3-61 of the DEIR, the average asbestos content of the total mined material is of primary concern given that asbestos does not have established acute noncancer effects. The purpose of Transmission Electron Microscopy (TEM) testing, which utilizes an electron microscope, in the ASUR Plan is not to control the fate of the rock and tailings after it reaches surface (that is the purpose of the PLM testing described above). Rather, the TEM testing is done for forward planning purposes to verify that mine planning is effectively minimizing the potential for public exposure to airborne asbestos from the project. Therefore, the TEM results are not required immediately and would not constrain the project operations as asserted by the commenter.

### **Response to Comment Ind 353-4**

The commenter states that blasting will continue 24 hrs per day 7 days a week under 2,585 acres and those ongoing explosions are to occur as little as 200 feet below inhabited areas. As discussed in the DEIR, regular drift round blasting would occur approximately twice daily over several seconds. Longhole blasting might occur every three or four days and would last for only seconds. Blasting would typically take place between work shifts (7:00AM and 7:00PM). Except for the construction of the proposed Service Shaft, located on the applicant's surface property, no blasting would take place closer than 500 feet below ground surface. Economic gold mineralization does not exist everywhere within the mineral rights and therefore blasting would not take place under an area of 2,585 acres. As shown on Sheet 15 of Appendix K.2, assumed mining areas are based on the projected down-dip extensions to mineralized veins historically mined. Further, please see Master Response 7 – Location of Future Mining Areas. As discussed therein, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps



A101, A201 and A202), and will also prohibit blasting closer than 500 feet below ground surface except for construction of the service shaft.

The commenter believes that the project should be evaluated by comparison to other massive extraction projects in populated areas which have failed. The commenter does not provide any information on these other extraction projects. The commenter believes the DEIR should provide evidence by example that no residential area has been rendered uninhabitable by similar projects. The Idaho-Maryland Mine and the adjacent Empire and Northstar mines were previously in production and closed around 1956. Residential zones in the areas surrounding these mines have been inhabited during and after these historic operations. The DEIR evaluates impacts from the actual activities proposed by the project in accordance with CEQA. A comparison to other projects would not achieve the goal and purpose of the DEIR.

### **Response to Comment Ind 353-5**

The commenter asserts that until an ADMP is approved, that air quality impacts from asbestos must be considered significant and unavoidable. However, CEQA regulations state that compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (see CCR § 15126.4.) Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to the NSAQMD for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Components of the ASUR Plan will become part of the approved ADMP and other components will be used as company policy and procedures to assist with compliance with the ADMP.

The commenter believes that all asbestos fibers present in rock can be fully liberated from dust particles. The commenter is incorrect and appears not to understand the nature of naturally occurring asbestos fibers, which are part of the mineral composition of certain rocks. While the air quality analysis assumes a conservative level of asbestos fiber liberation into air (see Master Response 22 – Conservatism used for Asbestos Assessment), most asbestos fibers present in rocks would not be liberated from either the rock or dust particles created from the rocks and would not be counted as asbestos in an air sample because they have no effect on human health.

The commenter believes that asbestos fibers are too small to be detected to ensure compliance with the approved ADMP. However, the procedures for air monitoring for asbestos are specified by California regulations and require the use of procedures developed by the US EPA. These procedures have been developed to ensure the protection of the public health from naturally occurring asbestos fibers. Please see Master Response 22 – Conservatism used for Asbestos Assessment.

### **Response to Comment Ind 353-6**

TEM measurements are converted to PCM equivalent units in order to calculate health risk. Conversion factors and cancer potency factors are provided in OEHHA – Air Toxic Hot Spots Program – Risk Assessment Guidelines Appendix C. OEHHA is the lead state agency for the assessment of health risks posed by environmental contaminants in California. The health risk associated with asbestos exposure from the project, as presented in the DEIR, was based on the OEHHA guidelines.





### **Response to Comment Ind 353-7**

Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to the NSAQMD for review and approval. The requirements for the ADMP are regulated by the Asbestos ATCM for Construction, Grading, Quarrying and Surface Mining Operations [17 CCR 93105]. The NSAQMD may revise the ADMP on the basis of air monitoring. The NSAQMD is responsible for approval and enforcement of the ADMP. The NSAQMD is responsible for providing the resources/manpower (such as Air Pollution Control Officers) in order to fulfill its regulatory role. Compromised enforcement is a speculative assertion without justification provided. As stated in CEQA Guidelines Section 15384, “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.” As this comment regarding compromised enforcement amounts to speculation, no further response is necessary.

Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

### **Response to Comment Ind 353-8**

The Health Risk Assessment for the project assumes that every asbestos structure present in dust (coarse particulate matter, PM<sub>10</sub>) is liberated and would be counted as 1 structure in a given air mass. This is a very conservative assumption as a large proportion of asbestos structures would not be liberated and would be enclosed in dust particles. This is the most conservative assumption possible and overstates calculated health risk. A refinement of the relationship between asbestos found in rock samples and how much becomes airborne is therefore unnecessary for the analysis of the DEIR. Please see Master Response – Conservatism of Asbestos Assumptions.

### **Response to Comment Ind 353-9**

Samples from various lithologies at the Idaho-Maryland Mine Project were selected for asbestos testing. Sampling was based on lithologies where mining could take place and not on percentages of drill holes completed during exploration. As stated on page 7 of the ASUR Plan, Rise completed 19 exploration drill holes, totalling 67,500 feet of drilling, from 2017 to 2019. Forty-two (42) samples, mainly from diamond drill core from various lithologies at the Idaho-Maryland Mine Project, were submitted for asbestos testing in 2019. PLM testing was done on forty samples and TEM testing was done on two samples. In 2021, Rise requested the 40 samples previously submitted (and analyzed by PLM) to be reanalyzed using the TEM method. The location of exploration samples tested for asbestos are shown on sheets 1-3 of the ASUR Plan; sample name, drill hole, downhole depths, sample interval, rock type, and test results are provided in the appendix of the ASUR Plan (Appendix E.2 of the DEIR).

Prior to underground gold mining, intensive planning efforts will be required to meet state and federal regulations and achieve safety, environmental, and economic goals. Underground mine planning includes exploratory drilling, geologic mapping, material logging, and testing. These





same processes also ensure future mining operations avoid and manage rock types that may contain naturally occurring asbestos. Please see Section 6.0 of the ASUR Plan (Appendix E.2 of the DEIR). Please also refer to Master Response 7 – Location of Future Mining Areas.

### **Response to Comment Ind 353-10**

Please see Response to Comment Ind 353-9.

### **Response to Comment Ind 353-11**

The asbestos content in rock is related to lithology and not proximity. Please see Response to Comment Ind 353-9 regarding sampling for naturally occurring asbestos. Naturally occurring asbestos (chrysotile) has been found in serpentinite and the management of this material will be required as discussed in the DEIR and ASUR Plan. Serpentinite is not a favorable host rock for gold mineralization and therefore a significant amount of serpentinite is not expected to be mined. Certain historic gold veins were hosted in serpentinite, which has altered to ankerite. This alteration process also alters chrysotile fibers into a non-asbestos mineral form. Very little asbestos is present in historic mine tailings derived from millions of tons of historic mining, including veins hosted in ankeritized serpentine. Please see Master Response 9 - Historical Mine Waste at Centennial Site.

### **Response to Comment Ind 353-12**

Asbestos by Polarized Light Microscopy (PLM) cannot be directly compared to Transmission Electron Microscopy (TEM) or Phase Contrast Microscopy (PCM) results. The OEHHA Guidelines provide a conversion of TEM structures to PCM equivalent fibers and from PCM fibers to PCM weight percent.

The use of PLM is required to comply with the Asbestos ATCM for Surfacing. This ATCM is designed to protect the public from exposure to asbestos from materials used for Surfacing. The use of TEM testing is required in order to calculate health risk in accordance with OEHHA guidelines.

PLM and TEM testing serve different purposes and are appropriately used for those different purposes in the analysis of the DEIR.

TEM measurements are converted to PCM equivalent units in order to calculate health risk. Conversion factors and cancer potency factors are provided in OEHHA – Air Toxic Hot Spots Program – Risk Assessment Guidelines Appendix C. OEHHA is the lead state agency for the assessment of health risks posed by environmental contaminants in California. These conversions are provided in footnotes and references of the Air Quality Technical Report (Appendix E.1 of the DEIR).

### **Response to Comment Ind 353-13**

The commenter is referring to a draft version of the ASUR plan which is not included in the DEIR. Please see Appendix E.2 of the DEIR.

Page 4.3-61 of the DEIR has been modified in the Final EIR as follows:

The applicant has prepared an Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR Plan) which is designed to ~~exclude~~ minimize asbestos containing material, serpentinite, or ultramafic rock from the engineered fill produced as part of the project.

The above change is for clarification purposes and comports with the language in the ASUR Plan (see Appendix E.2 to the DEIR).



Asbestos Containing Material is material with detectable asbestos using Polarized Light Microscopy (PLM). This material will not be used for Surfacing. If planned mining is projected to result in the Asbestos Inventory 3-month rolling average to exceed 0.01% by mass of equivalent PCM units, gold mineralization will not be mined and barren rock will either not be mined or mined using a dust collection system and materials disposed underground (see page 9 of the Appendix E.2).

The commenter asks if detection of asbestos in rock would result in useless gold ore or barren rock. The purpose of the ASUR Plan is to manage mined materials to ensure public health risk from asbestos is minimized in compliance with the ADMP required by Mitigation Measure 4.3-2. If gold ore or barren rock contains asbestos that would potentially result in non-compliance with the ADMP, it would be managed in a manner as described in the ASUR plan, as discussed above.

The commenter asks if there is still enough rock to warrant mining given the restrictions of the ADMP and management procedures to comply with the ADMP outlined in the ASUR Plan. The assumed asbestos content in materials used for the purpose of health risk assessment, using the maximum allowable content in rock for the ASUR Plan, are much greater than actual content of asbestos in materials based on sampling of drill core and historic mine tailings. Please see Master Response 22 – Conservatism used for Asbestos Assessment. Therefore, it is expected that the measures required by the ADMP will not appreciably impact future production of the proposed mining operations.

The commenter states that the DEIR cannot be approved until the operational plans discussed in the ASUR Plan are completed and incorporated into the DEIR. Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to the NSAQMD for review and approval. Components of the ASUR Plan will become part of the approved ADMP and other components will be used as company policy and procedures to assist with compliance with the ADMP. The details of applicant operational plans are not required to be completed for the approval of the DEIR because they are only indirectly related to the ADMP, which is required by Mitigation Measure 4.3-2, and this mitigation measure ensures that potential health impacts to the public from naturally occurring asbestos would be less than significant after mitigation. Further, CEQA regulations state that compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (see CCR § 15126.4.)

#### **Response to Comment Ind 353-14**

The Health Risk Assessment for the project assumes that every asbestos structure present in dust (coarse particulate matter, PM<sub>10</sub>) is liberated and would be counted as 1 structure in a given airmass. This is a very conservative assumption as a large proportion of asbestos structures would not be liberated and would be enclosed in dust particles. This is the most conservative assumption possible and overstates calculated health risk. Please see Master Response 22 – Conservatism used for Asbestos Assessment. Although the Health Risk Assessment prepared for the project is conservative, the analysis does not preclude the NSAQMD from requiring air monitoring, as detailed in Mitigation Measure 4.3-2 of the DEIR.

#### **Response to Comment Ind 353-15**

Please see Responses to Comments Ind 353-1 through Ind 353-14. The County acknowledges the comment and notes it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the DEIR. For that reason, the County provides no further response to this comment.



### **Response to Comment Ind 353-16**

The commenter provides a definition for “mineralization” from a google search online<sup>1</sup>, which refers to vermicomposting and soil mineralization, as set for the below:

Mineralization is the process by which chemicals present in organic matter are decomposed or oxidized into easily available forms to plants. Transformation of organic molecules in soil is mainly driven by its microbiota such as fungi and bacteria along with earthworms.

The project is a mining project and the definition of mineralization provided by the commenter, related to composting, is not a conventional definition of mineralization and is not relevant to the analysis.

A conventional<sup>2</sup> definition of a mineral is as follows:

- 1) Ore
- 2) An inorganic substance
- 3) Something neither animal or vegetable
- 4) A solid homogenous crystalline chemical element or compound that result from the inorganic processes of nature.

The term mineralization or mineralized rock in the DEIR refers to vein materials (“ore”) which contain gold and sulphide minerals such as pyrite hosted and adjacent to quartz veins. These sulphide minerals are extracted from the rock during mineral processing by flotation (see page 3-25 of the DEIR). The sale of the resulting sulphide concentrate removes the majority of sulphide minerals that could potentially cause environmental concerns (see page 4.8-46 of the DEIR). Mineral processing does not remove asbestos fiber from rock because asbestos fibers are not sulphide minerals which can be separated by the flotation process. Asbestos emissions are mitigated through the required Asbestos Dust Mitigation Plan and minimized through management of materials as described in the ASUR Plan.

### **Response to Comment Ind 353-17**

The standard for the maximum allowable content of asbestos in rock mined is 0.01% by mass of PCM equivalent units (see page 4.3-61 of the DEIR). The Health Risk Assessment has shown the risk to the public is less than significant assuming this content of asbestos in rock. The Health Risk Assessment is based on conservative assumptions. Please see Master Response 22 – Conservatism used for Asbestos Assessment.

### **Response to Comment Ind 353-18**

The commenter is referring to section (d)(3) of the Asbestos ATCM for Surfacing. Any person who sells, supplies, or offers for sale or supply restricted material for non-surfacing applications must provide with each sale or supply a written receipt containing the following statement:

**“WARNING! This material may contain asbestos.** It is unlawful to use this material for surfacing or any application in which it would remain exposed and subject to possible

<sup>1</sup><https://www.sciencedirect.com/topics/engineering/mineralization#:~:text=Mineralization%20is%20the%20process%20by,along%20with%20earthworms%20%5B38%5D>.

<sup>2</sup><https://www.merriam-webster.com/dictionary/mineral>



disturbances. Extreme care should be taken when handling this material to minimize the generation of dust.”

Surfacing is defined in the Section (i)(26) of the ATCM as follows: "**Surfacing**" means the act of providing or creating a temporary or permanent covering for a surface used for pedestrians, motor vehicles, non-motor vehicles, decoration, landscaping, soil stabilization, or erosion control. Examples of surfaces include, but are not limited to, roads, road shoulders, streets, access roads, alleys, lanes, driveways, parking lots, playgrounds, trails, squares, plazas, and fairgrounds. For the purposes of this section, “surfacing” does not include creating a covering composed of asphalt concrete or portland cement concrete.

Paving with asphalt concrete or Portland cement concrete is not Surfacing as defined in the ATCM and therefore not illegal as the commenter states.

The project would not use Asbestos Containing Material for Surfacing (see page 4.3-61 of the DEIR).

### **Response to Comment Ind 353-19**

The reference to Portola Valley is correct and refers to the so-named area within Plumas County, which is in the Mountain Counties Air Basin. See [https://www.arb.ca.gov/desig/adm/2020/state\\_pm25.pdf?\\_ga=2.165607803.555060607.1660866051-1593822733.1612388870](https://www.arb.ca.gov/desig/adm/2020/state_pm25.pdf?_ga=2.165607803.555060607.1660866051-1593822733.1612388870).

### **Response to Comment Ind 353-20**

The text “TEM is the preferred analytical method for outdoor asbestos samples because of its ability to detect small fibers (greater than or equal to 0.0002 microns in diameter)” is taken directly (and reproduced exactly) from the OEHHA – Air Toxic Hot Spots Program – Risk Assessment Guidelines Appendix C.



Individual Letter 354

Ind 354-1

March 20, 2022

Dear Board Members -

I have enclosed a clipping stating another reason to NOT vote yes on reopening the mine. How could anyone with common sense, say the Nevada Co. Air Park is a small aircraft airport? There are so many reasons - read letters to the editor - to not open this mine. Please do not open it - too many lives will be adversely affected - dry wells, poorer air quality, breathing issues for all etc. etc. etc. Think of your ~~the~~ grandchildren and what you are leaving them -

A MESS! Jim & Helen Bradshaw

Dist 1





## A small aircraft airport, really?

Ind 354-2

I'm gradually working my way through the Idaho-Maryland Mine project draft environmental report and can't believe the amount of misinformation that I am encountering.

The latest is in the Hazards and Hazardous Materials section, on page 4.7-10, under the heading of "Nearest Airports." The first paragraph states, "The closest public use airport to the project site is the Nevada County Air Park, a small aircraft airport, located east of Brunswick Road and north of Loma Rica Drive, less than one mile (approximately 4,000 feet) from the Brunswick Industrial Site."

By referencing "a small aircraft airport," it appears that there is an attempt to minimize the importance of the Nevada County Airport. There is no acknowledgment that this is a major base for the U.S. Forest Service and CalFire. The location places the airport 20 minutes from other airports, which during

### OTHER VOICES

Ray Bryars

fire season provides robust coverage of Nevada County and adjacent counties.

The county website, [mynevadacounty.com](http://mynevadacounty.com), has the following information regarding the airport:

"Nevada County Airport is home to the Forest Service and CalFire Grass Valley Air Attack Base. This center of wildland firefighting from the air is the permanent location for two Grumman S-2 air tankers that drop fire retardant, and two air attack aircraft that coordinate the efforts of the tankers and other firefighting assets and personnel. Aircraft from Nevada County Airport are on standby, ready to respond to fires throughout the foothills and mountains. When larger fires occur nearer to the airport, many other firefighting aircraft use the airport as a base for operations. Search and Rescue and med-evac aircraft also use the airport

year-round for public safety missions."

In addition, I found the airport is used for law enforcement, business, transportation, tourism and education for youth through programs such as the Young Eagles Program.

It is shocking that Rise Gold ignores the huge positive benefit that the airport provides by stating that it is a "small aircraft airport."

Does Rise Grass Valley want to minimize the importance of the airport so that we will ignore the fact that they will be transporting and storing explosives within 4,000 feet of the airport and right under some of the flight paths?

In the fall of 2021 we had two potentially disastrous fires just below the airport, plus the River Fire just a few miles south. Imagine what it would have been like if the planes that were fighting these fires became grounded due to the possibility of explosives being ignited. Many of us

witnessed the great job that the firefighters did and are very aware of the extremely brisk spread that was only brought under control by rapid action by many brave firefighters and the pilots from the Nevada County Airport.

It amazes me that Nevada County allows a penny stock speculator with his history of running away from the Banks Island Gold toxic spill in British Columbia, Canada, followed by declaring bankruptcy, can be allowed to hold hostage the residents of Grass Valley and Nevada County.

There must be a way to stop wasting everyone's time and put an end to the possibility of re-opening the Idaho-Maryland Mine forever. I implore our county supervisors to do the right thing for the community and end this whack-a-mole madness. The airport is vital to the safety, vitality and future of Nevada County.

Ray Bryars lives in Nevada City.



## **INDIVIDUAL LETTER 354: JIM AND HELEN BRADSHAW**

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### **Response to Comment Ind 354-1**

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues.

In addition, as detailed on page 4.7-36 of the DEIR, the applicable threshold for the purpose of CEQA analysis in evaluating potential hazards impacts related to the project site's proximity to the Nevada County Air Park is whether the project would result in a safety hazard or excessive noise for people residing or working in the project area. As discussed therein, the project is not a noise-sensitive use, would not pose a hazard to flight, and would not exceed applicable density requirements; therefore, the DEIR concludes that a less-than-significant impact would occur.

### **Response to Comment Ind 354-2**

The comment is a scanned copy of a local editorial, which the commenter has provided to support the sentiments expressed in Individual Letter 354. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 355**

Fwd: mine

about:blank?compose

Nevada County Board of Supervisors  
950 Maidu Ave., Suite 200  
Nevada City, CA 95959

**Dist 3**

March 9th, 2022

Dear Supervisor Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I see no benefit coming to the County from the opening of the Idaho-Maryland Mine by Rise Gold.

**Ind 355-1**

From the DEIR I see that water availability for the mine project is based on past years, not on current extreme drought years. Rise Gold has grossly underestimated the impact water use and water removal will have on the water table and adjacent homes, while offering a paltry mitigation time period within the 80 years of their lease. The noise and vibration from trucks and blasting will disturb my patient.

**Ind 355-2**

**Ind 355-3**

The diesel Fumes and heavy metal mine dust pollution are all dangerous to our health and businesses.

**Ind 355-4**

Dumping massive amounts of water into Wolf Creek will stir up past mining toxins in the stream channel and destroy habitat. We already live in a cancer hot spot. We have already experienced the toxic effect of the past mining era. New safety technologies can not mitigate all this. And why does anyone trust Ben Mossman of Rise Gold? His Banks Island Gold, polluted tribal waters, went bankrupt and left a mess for Canadians to clean up. He and others involved have 18 pollution charges that are going to trail in April.

**Ind 355-5**

My business is located at 518 South Auburn St., Grass Valley. I already am negatively impacted from the noise, vibration and bad air along the 49/South Empire corridors. I DO NOT WANT an industrial gold mine at my front door and I don't know a single person, no matter their political persuasion, who thinks this mine is a good idea. For God's sake please find another source of tax dollars that will actually benefit the community instead of polluting our County and making us sick.

Thank you for your dedication to Nevada County,

  
Jim Cunningham  
800 Freeman Ln., Ste 307  
Grass Valley, CA 95949  
530-277-3936  
[jimacpt@sbcglobal.net](mailto:jimacpt@sbcglobal.net)



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## **INDIVIDUAL LETTER 355: JIM CUNNINGHAM**

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### **Response to Comment Ind 355-1**

Please see Master Responses 1, 14, 15, and 16.

The comment expresses a general opinion that the mitigation measures set forth in the DEIR require a “paltry” time period for addressing potential impacts associated with water levels, but does not provide specific examples that would allow for a detailed response. The DEIR evaluates the proposed project’s potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin under Impact 4.8-2, which starts on page 4.8-54. Because the DEIR concludes that a significant impact could occur, Mitigation Measures 4.8-2(a) through 4.8-2(c) require that the Project Applicant implement the Groundwater Monitoring Plan (GMP) prepared by Itasca Denver, Inc., as approved by the County, and install a network of monitoring wells. Should mining operations result in a significant impact to any wells, the mitigation set forth therein additionally requires that the Project Applicant provide a comparable supply of water to such homes or businesses whose wells are significantly impacted, and if necessary, provide an immediate water supply until the source of the problem is determined and rectified. With incorporation of Mitigation Measures 4.8-2(a) through 4.8-2(c), the DEIR concludes that a less-than-significant impact would occur.

### **Response to Comment Ind 355-2**

The commenter expresses general concerns regarding noise and vibration but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Noise and vibration are addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

### **Response to Comment Ind 355-3**

The commenter expresses general concerns regarding diesel fumes and heavy metal dust but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 18 and 20.

### **Response to Comment Ind 355-4**

The commenter expresses general concerns regarding discharge into Wolf Creek but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 35.

### **Response to Comment Ind 355-5**

Please see Master Responses 1 and 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 356**

about:blank?compose

(no subject)

Nevada County Planning Commission  
950 Maidu Ave., Suite 170  
Nevada City, CA 95959

March 9th, 2022

To The Planning Commission:

**Ind 356-1**

I see no benefit coming to the County from the opening of the Idaho-Maryland Mine by Rise Gold.

**Ind 356-2**

From the DEIR I see that water availability for the mine project is based on past years, not on current extreme drought years. Rise Gold has grossly underestimated the impact water use and water removal will have on the water table and adjacent homes, while offering a paltry mitigation time period within the 80 years of their lease. The noise and vibration from trucks and blasting will disturb my patient.

**Ind 356-3**

The diesel Fumes and heavy metal mine dust pollution are all dangerous to our health and businesses.

**Ind 356-4**

Dumping massive amounts of water into Wolf Creek will stir up past mining toxins in the stream channel and destroy habitat. We already live in a cancer hot spot. We have already experienced the toxic effect of the past mining era. New safety technologies can not mitigate all this. And why does anyone trust Ben Mossman of Rise Gold? His Banks Island Gold, polluted tribal waters, went bankrupt and left a mess for Canadians to clean up. He and others involved have 18 pollution charges that are going to trail in April.

**Ind 356-5**

My business is located at 518 South Auburn St., Grass Valley. I already am negatively impacted from the noise, vibration and bad air along the 49/South Empire corridors. I DO NOT WANT an industrial gold mine at my front door and I don't know a single person, no matter their political persuasion, who thinks this mine is a good idea. For God's sake please find another source of tax dollars that will actually benefit the community instead of polluting our County and making us sick.

Thank you for your dedication to Nevada County,

  
Jim Cunningham  
800 Freeman Ln., Ste 307  
Grass Valley, CA 95949  
530-277-3936  
[jimacpt@sbcglobal.net](mailto:jimacpt@sbcglobal.net)





## **INDIVIDUAL LETTER 356: JIM CUNNINGHAM**

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### **Response to Comment Ind 356-1**

See Response to Comment Ind 355-1.

### **Response to Comment Ind 356-2**

See Response to Comment Ind 355-2.

### **Response to Comment Ind 356-3**

See Response to Comment Ind 355-3.

### **Response to Comment Ind 356-4**

See Response to Comment Ind 355-4.

### **Response to Comment Ind 356-5**

See Response to Comment Ind 355-5.



**Individual Letter 357**

Dist 3

**RECEIVED**

FEB 22 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

clerk of the board  
950 maidu avenue, ste. 200,  
nevada city, ca 95959

members of the board of supervisors for nevada county,

**Ind 357-1**

i am choking on my own rage here. so the time to be polite is over. the latest public relations document from rise gold is bullshit. complete bullshit. there is not a single truthful piece of information that they have printed on that paper. of course, in this day and age, spreading lies, disinformation, and bullshit is commonplace. and for the most part that bullshit just ruffles feathers, and little more. but this isn't about false existential threats on our 'freedom,' this is about poisoning our water, our land, our air. it's about cursing the people you claim to represent with cancer. fuck that. i refuse to accept that, thus i demand that you deny rise gold's application immediately.

i have expressed my discontent over this matter a number of times, and i gather this is just filed away. as such file this in the bin marked 'with extreme animosity.' if you do not have a bin, please create one; as i guarantee i will not be the last to voice my disgust with this matter.

**Ind 357-2**

with profound displeasure,

jim haynes  
113 winchester street  
grass valley, ca 95945



13242 jeabjo street  
nevada city, california 95959



## **INDIVIDUAL LETTER 357: JIM HAYNES**

---

### **Response to Comment Ind 357-1**

Please see Master Responses 1 and 3.

The comment expresses a general opinion that the proposed project would result in impacts related to water, land, air, and human health, but does not provide specific examples that would allow for a detailed response.

### **Response to Comment Ind 357-2**

Please see Master Responses 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 358**

mr. matt kelley  
senior planner  
nevada county planning department  
950 maidu avenue, suite 170  
nevada city, ca 95959-790

**Ind 358-1**

mr. kelley,

i am choking on my own rage here. so the time to be polite is over. the latest public relations document from rise gold is bullshit. complete bullshit. there is not a single truthful piece of information that they have printed on that paper. of course, in this day and age, spreading lies, disinformation, and bullshit is commonplace. and for the most part that bullshit just ruffles feathers, and little more. but this isn't about false existential threats on our 'freedom,' this is about poisoning our water, our land, our air. it's about cursing the people you claim to represent with cancer. fuck that. i refuse to accept that, thus i demand that you deny rise gold's application immediately.

i have expressed my discontent over this matter a number of times, and i gather this is just filed away. as such file this in the bin marked 'with extreme animosity.' if you do not have a bin, please create one; as i guarantee i will not be the last to voice my disgust with this.

**Ind 358-2**

with profound displeasure,

jim haynes  
113 winchester street  
grass valley, ca 95945

13242 jeabjo street  
nevada city, california 95959



## **INDIVIDUAL LETTER 358: JIM HAYNES**

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### **Response to Comment Ind 358-1**

See Response to Comment Ind 357-1.

### **Response to Comment Ind 358-2**

See Response to Comment Ind 357-2.





**Individual Letter 359**

**From:** [Jim Haynes](#)  
**To:** [BCS Public Comment](#)  
**Subject:** rise gold's latest public relations deceit  
**Date:** Tuesday, February 15, 2022 7:36:50 PM

**Dist 3**

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**Ind 359-1**

members of the board of supervisors for nevada county,

i am choking on my own rage here. so the time to be polite is over. the latest public relations document from rise gold is bullshit. complete bullshit. there is not a single truthful piece of information that they have printed on that paper. of course, in this day and age, spreading lies, disinformation, and bullshit is commonplace. and for the most part that bullshit just ruffles feathers, and little more, but this isn't about false existential threats on our 'freedom,' this is about poisoning our water, our land, our air. it's about cursing the people you claim to represent with cancer. fuck that. i refuse to accept that. thus i demand that you deny rise gold's application immediately.

**Ind 359-2**

i have expressed my discontent over this matter a number of times, and i gather this is just filed away. as such file this in the bin marked 'with extreme animosity,' if you do not have a bin, please create one; as i guarantee i will not be the last to voice my disgust with this matter.

with profound displeasure,

jim haynes  
113 winchester street  
grass valley, ca 95945

13242 jeabjo street  
nevada city, california 95959



## **INDIVIDUAL LETTER 359: JIM HAYNES**

---

### **Response to Comment Ind 359-1**

See Response to Comment Ind 357-1.

### **Response to Comment Ind 359-2**

See Response to Comment Ind 357-2.



**Individual Letter 360**

mr. matt kelley  
senior planner  
nevada county planning department  
950 maidu avenue, suite 170  
nevada city, ca 95959-790



**Ind 360-1**

dear mr. kelley,

we are writing once again to express our disapproval, nay disgust, with the consideration to re-open the idaho-maryland mine as proposed by the canadian mining firm rise gold. even before we had done our due diligence by studying the literature available on this proposed mine, we were against it. all our suspicions were confirmed that the impacts of the mine would be irreparable and extensive. this not only includes the toxicity from the tailings for which rise gold would self-

**Ind 360-2**

monitor, the impact of noise pollution on a corridor that will be even further impacted by the dorsey marketplace currently under construction, but also the immoral devastation caused by the dewatering of our land. it has been noted by numerous experts (including engineers at NID) that the hydrology studies from the DEIR is insufficient and / or out of date, likely to be much worse than the paucity of information that was offered.

**Ind 360-3**

water seeks its own level. this is a phrase linked to hydrology though it has been appropriated within sociology. on the date that we write this letter, there has been zero precipitation for over 30 days in a time period that has historically been the wettest for this part of california. when the water is removed from a mine, the water from other sources will seep into this void. the DEIR's hydrology is insufficient in predicting the impacts of this and inadequate in offering mitigation. how can you in good conscious allow this proposal to continue as the climate change worsens the environmental conditions in which we live? no mitigation will offset the impacts that will be exacerbated by a needless mine. we need water. the fauna of california needs water. the forests need water. our future needs water. throwing all of that away for a scant amount of jobs, promised by a disreputable company to a few people outside our community, is profoundly mistaken.

**Ind 360-4**

as our representatives in this matter, we demand that you immediately put a stop to this proposal. end it now, and end it forever.

yours in magnanimity,

jim and erika haynes  
113 winchester street  
grass valley, california 95945

A handwritten signature in black ink that reads "Erika Haynes". The signature is written in a cursive style with a large, looped initial "E".

13242 jeabjo street  
nevada city, california 95959



## **INDIVIDUAL LETTER 360: JIM AND ERIKA HAYNES**

---

### **Response to Comment Ind 360-1**

Please see Master Response 1. The commenter expresses general concerns regarding toxicity from mine tailings but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 360-2**

The commenter expresses general concerns regarding noise but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 360-3**

Please see Master Responses 13, 14, and 15.

### **Response to Comment Ind 360-4**

Please see Master Responses 1 and 13 through 16. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 361**

**From:** [Jim Morris](#)  
**To:** [Idaho MMEIB](#)  
**Subject:** Idaho Maryland Mine Draft EIR  
**Date:** Monday, April 4, 2022 4:17:02 PM

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

**Do not click links or open attachments unless** you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Dear Nevada County Planning Commission,

I consider the groundwater hydrology studies in this Draft EIR to be woefully inadequate in addressing the potential impact on the local groundwater. The complexity of the groundwater hydrology in this geology cannot be understood with this level of study. I have worked as a Civil Engineer in California since 1983 in the field of Geotechnical Engineering.

James E. Morris, PE

10732 Willow Valley Rd.  
Nevada City, CA 95959

**Ind 361-1**





## **INDIVIDUAL LETTER 361: JIM MORRIS**

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### **Response to Comment Ind 361-1**

Please see Master Responses 13 through 16.



**Individual Letter 362**

	<p>DEIR Comments to Reopen the Idaho-Maryland Mine</p> <p>April 3, 2022</p>
<b>Ind 362-1</b>	<p>My name is Jim Otto and I live at 14069 Diamond Court in Grass Valley which is located off East Bennett Road. I live directly on top of the Idaho-Maryland Mine workings. As a result, my wife and I are living at Ground Zero for this project. This is the third time in the past 30 years that we have had to fight for our water, air, and quality of life, due to a proposed reopening of the Idaho-Maryland Mine.</p>
<b>Ind 362-2</b>	<p>We own one of the 30 wells identified in the DEIR that is at high risk for dewatering. As such, the well mitigation plan is our biggest concern. It is inadequate for the following reasons:</p>
<b>Ind 362-3</b>	<p>The well mitigation plan calls for providing NID water to 30 properties along East Bennett Road. The problem is that the hydrogeology in the area is complex. There have been many dewatering studies conducted over the past 30 years, and the one clear conclusion is that nobody knows for certain what will happen to domestic wells when the mine is dewatered. As such, there is an unknown risk to well owners. There are approximately 500 wells within ½ mile of the mineral rights boundary. It's critically important that these wells be identified in the EIR so well owners can assess their risk of dewatering.</p>
<b>Ind 362-4</b>	<p>A well failure would be a catastrophic event for a homeowner. Without water a property is essentially worthless. Thirty properties will receive NID water, but the DEIR does not address what steps will be taken if a well fails that is outside that area. The applicant needs to define a service level agreement to provide immediate temporary water, as well as a permanent solution. The applicant should provide financial assurances (e.g. bonds) that they can provide NID water to all failed wells in the area in a timely manner.</p>
<b>Ind 362-5</b>	<p>The DEIR states that prior to dewatering, Rise Gold would offer 30 properties along East Bennett Road to be connected to NID (Page 3-36). <i>"If the property owner decides to connect to the potable water line, the project applicant would fund the permitting and construction costs"</i>. If the homeowner decides to connect to the potable water line and does not want to abandon their well: Prior to dewatering, it needs to be setup so simply turning a valve will provide IMMEDIATE water to the home. Thus, avoiding ANY interruption of water supply, particularly on a weekend or holiday. Any NID required backflow device should be paid for by Rise Gold. If the property owner declines the original offer to connect to NID, and then their well fails after dewatering commences: Will Rise Gold still pay for NID permitting, construction costs, and all monthly fees? It should.</p>
<b>Ind 362-6</b>	<p>The DEIR section 4.8-2(c) states that <i>"the applicant will pay for all monthly NID charges until the property is sold or annexed by the city of Grass Valley"</i>. Rise Gold should pay for all NID monthly charges for the lifetime of the project and regardless of whether the property sells. This section also states that Rise Gold would pay for up to 400 gallons of NID water per day. NID has stated that the average water use in the region is greater than 500 gallons per day. In addition, the DEIR states that NID water will be supplied by the smallest pipe that NID offers, consisting of 5/8". Our current well provides twice that amount of water. Thus, NID's larger 3/4" pipe should be used. Our current well water has been thoroughly tested and is pristine. NID adds Aluminum Sulfate and Sodium Hydroxide to its water. We have a large pond and waterfall that serves fish and wildlife that don't tolerate Chlorine. Therefore, Rise Gold should pay for water filtration systems to remove Aluminum, Sodium, and Chlorine. This all needs to be adjusted in the EIR.</p>



**Ind 362-7**

Well owners face significant impacts related to the mine reopening. The EIR should include creating a Water Review Team that include representatives from Rise Gold, the County, and well owners. The Siskon Gold Project included community involvement around well issues. By all accounts this arrangement of the applicant, local government, and a community liaison was very effective in quickly addressing and resolving well issues.

**Ind 362-8**

A final issue related to mine dewatering is the potential to increase the risk of fire. The average rainfall in Grass Valley has decreased significantly in recent years. This has resulted in historic fire damage in Northern California. The DEIR does not adequately address the impact that dewatering will have on vegetation in the area. Any significant loss of water to vegetation would add to increased fire risk at a time when the area has experienced several years of historically destructive fires. The EIR must address how soil moisture in the area will be monitored, before and after dewatering.

**Ind 362-9**

Another major concern with the DEIR is vibration resulting from underground blasting operations. Page 3-20 of the DEIR says that Rise plans to use 0.93 tons (1860 lbs.) of explosives and 257 detonators per day. This is approximately 40% of the explosive power of the 1995 Oklahoma City bombing. Page 2-97 discusses the Vibration Monitoring program. The monitoring will be conducted at the Brunswick site. The problem is that blasting may occur directly under homes along East Bennett Road and within 500' of the surface. Monitoring needs to be added to residential areas where blasting is occurring. Also, there is no mention of how homeowners may report unacceptable levels of blast vibration to Rise or the County. There needs to be a way to report these disturbances and a method for modifying the blasting plan down to an undetectable level.

**Ind 362-10**

We live 1/3 of a mile from the Brunswick surface site, so noise is a big concern. The Summary of Long-term Noise Monitoring (Table 4.10-1) is grossly inadequate. Of the 12 noise monitoring sites, the maximum "long-term" monitoring duration was 5 consecutive days. Worse, site #5 only had two days of monitoring, and site #12 only had one day. There are simply not enough data points. A minimum long-term study should be 90 days. This would reveal an honest noise pattern of the area. The DEIR does not address the process for reporting noise issues. Is it the County's job? If so, which department? What is the process for report a noise issue? This should be addressed in the EIR.


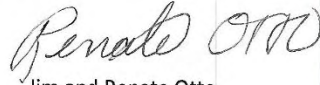
**Ind 362-11**

Finally, the DEIR does not adequately address damage to local roads caused by truck traffic. Page 4.7-37 states that there will be up to 100 truckloads of engineered fill per day. Each truckload will carry 20 tons of fill, and this could continue for 80 years. This will cause excessive road damage between the Brunswick and Centennial sites. The DEIR does not address the annual road maintenance costs from truck traffic. Since the applicant will cause significant road damage, they should help fund road repairs. Every winter cars slide off the top of the Brunswick grade. How will large trucks avoid doing the same? These should be added to the EIR.

**Ind 362-12**

Historic gold mining in Nevada County was an environmental disaster that we are still battling. Will reopening the Idaho-Maryland Mine add to that legacy? This project has several very significant environment impacts. Essentially, Rise Gold is proposing operating a gold mine in a residential area. This is unprecedented in California. It is critical that Nevada County thoroughly analyze the correct mix of mitigation measures to protect the environment and residents. But more importantly, the County needs to take a long, hard look at this project and decide if the benefits truly outweigh the risks.



  
  
Jim and Renate Otto





## **INDIVIDUAL LETTER 362: JIM AND RENATE OTTO**

---

### **Response to Comment Ind 362-1**

The commenters opposition to the project is noted for the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 362-2**

The commenter asserts that the well mitigation plan is inadequate but does not provide specifics in this comment. Please see the following responses to more detailed comments.

### **Response to Comment Ind 362-3**

The commenter asserts that the DEIR should identify wells within ½ mile of the mineral rights area; however, significant impacts to water supply are not anticipated this far from the project site. Please see Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

### **Response to Comment Ind 362-4**

General Plan Policy 17.12 and Mitigation Measure 4.8-2(b) already requires that the mine operator immediately replace water supply for wells where water supply or water quality issues occur due to the mine. Under General Plan Policy 17.12, the burden is on the mine operator to prove that the mine did not cause the water supply/quality issue, so this policy is protective of well owners. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

### **Response to Comment Ind 362-5**

The Well Mitigation Plan (Appendix K.9 of the DEIR) specifies that water meters will be installed at the property line and that the water meter would be connected to the house if requested and authorized by the property owner. Therefore, NID potable water would be available at any time unless a property owner refused authorization for this connection. The Well Mitigation plan has been revised to include the installation of Double Check Valves (see Appendix D to this Final EIR). If a property owner decides to retain and continue using their water well, the cost of the well's operation, including Double Check Valve monthly fees, would be the owner's responsibility and not the applicant's. All NID permitting, construction costs, and monthly fees would be funded by the applicant as described in the Well Mitigation Plan.

### **Response to Comment Ind 362-6**

Regarding annexation or sale of a property, please see Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The single-family home unit demand factor of 0.36 acre-feet per year per connection is used by NID for projecting demands. (Page 18 of the NID 2020 Urban Water Management Plan). This is





equivalent to 321 gallons per day. The well mitigation plan proposes compensation of up to 400 gallons per day or approximately 25% more than NID's estimate of demand for a single-family home. The water supply assessment uses a higher water consumption figure as a conservative measure to ensure adequate water supply; but this is not the appropriate figure to use for the well mitigation plan. A 5/8" water meter is sufficient to provide this capacity of water and is used by over 75% of NID treated water accounts (see Table 1 of NID capacity charge update available at <https://www.nidwater.com/files/0795f5c27/NIDCapacityChargeUpdate-2-12-14.pdf>)

The commenter states that water quality of NID potable water is lower than the water quality from domestic water wells but provides no evidence to support this statement. Drinking water supplied to Nevada Irrigation District (NID) customers continues to meet and exceed state and federal public health standards, based on testing results that serve as the basis for the District's Water Quality Report. See NID water quality report at <https://www.nidwater.com/files/1e68c2c9b/NID+WQR+2021.pdf>.

### **Response to Comment Ind 362-7**

The comment does not address the adequacy of the DEIR. Nevada County Environmental Health will have review and oversight authority regarding prospective well impacts, as outlined in Mitigation Measure 4.8-2. The comment is noted and will be provided to County decisionmakers for their consideration.

### **Response to Comment Ind 362-8**

As stated on page 4.13-21 of the DEIR, it can be reasonably concluded that the dewatering of the mine would not affect the available moisture for vegetation in the project area because the depth to groundwater is already below the typical rooting depths in higher topographic areas, while adequate flows would occur in South Fork Wolf Creek and Wolf Creek to maintain groundwater levels in the lower topographic areas. The dewatering would not, therefore, increase fire risk due to reduced groundwater levels. Please see Master Response 33 - Groundwater Dependent Vegetation.

### **Response to Comment Ind 362-9**

Mitigation Measure 4.10-4 requires ground vibration monitoring at nearby residences. The threshold of significance for blasting vibrations has been determined as 0.4 in/s. Please see Chapter 4.10 and Appendix M of the DEIR. The results of the ground monitoring vibration monitoring program shall be submitted to the Nevada County Planning Department for review, as required in Mitigation Measure 4.10-4. The Nevada County Code Compliance Division manages and investigates complaints, including complaints related to blasting. Please see Master Response 7 – Location of Future Mining Areas, and Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 362-10**

Please see Responses to Comments Ind 617-3 and Ind 617-4 regarding ambient noise measurements.

Mitigation Measure 4-10-3 requires a comprehensive noise monitoring program to be conducted for each facet of the operation to both verify the modelling assumptions of the project's noise analysis and to ensure that compliance with the applicable Nevada County noise standards is being achieved at nearby sensitive receptors. The permanent monitors shall be provided with a continual power source, and shall include internet connectivity technology, to enable electronic retrieval of noise monitoring data at any time by the County's third-party noise consultant.



The Nevada County Code Compliance Division manages and investigates complaints, including noise-related complaints. Please also see Master Response 3 - Operator Responsibility.

**Response to Comment Ind 362-11**

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

As stated on page 4.12-89 of the DEIR, TJKM's peer review also notes the presence of "ICY" signs on Brunswick Road, north of the Brunswick Industrial Site, which implies difficult traffic conditions during periods of inclement weather. As mentioned above, this portion of Brunswick Road is already regularly used by heavy-duty haul trucks. An approximate length of just over 900 feet exists from the crest of the hill on Brunswick Road to its down grade intersection with Loma Rica Drive. As is currently the case, it is incumbent upon individual truck drivers to drive with caution during periods of inclement weather. Mitigation Measure 4.12-6(f) requires that prior to commencement of operations, the Project Applicant shall obtain an encroachment permit from Nevada County and install: 1) W51 "Slow Trucks" road sign along Brunswick Road, about 500 feet north of the E. Bennett Road intersection; 2) A second sign shall be installed at the applicant's expense just south of the crest of the grade, warning truck drivers of the transition in grade and presence of the downgrade Loma Rica Drive intersection.

**Response to Comment Ind 362-12**

The commenter's opposition to the project is noted for the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.



**Individual Letter 363**

**From:** WAHLER ENTERPRISES  
**To:** Planning; jim.wahler  
**Subject:** Idaho-Maryland Mine Impact, comments by Jim Wahler, former City Planner///Fwd: Updated Notice of Availability of a Draft Environmental Impact Report and Notice of Re-Scheduled Public Meeting to provide Comments on the Idaho-Maryland Mine Draft EIR  
**Date:** Monday, February 7, 2022 4:07:55 PM  
**Attachments:** imae001.ipc  
Idaho Maryland Mine NOA Comment Period Extension Final.pdf

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Ind 363-1

Attention Matt Kelley,

I was a city planner for Lake County, Illinois from 1970-1973. During that time we were doing a lot of land use reports for that area.

Ind 363-2

I can tell you that a project of this kind, the Idaho-Maryland Mine operation would never have been allowed, considering the air, water, and noise factors to the community.

Ind 363-3

And looking at the track record of the developer, not being able to clean up the mess from other projects that he has done, that in itself would not even warranted his consideration to attempt it in an community as large as Grass Valley/Nevada City.

**It would be a tragedy to this area, a huge mistake, I would say catastrophic!!!**

Ind 363-4

I sincerely hope you can exercise your natural sense of planning ethics while making any decisions.

Sincerely,  
Jim Wahler, Former City Planner

----- Original Message -----

From: Idaho MMEIR <Idaho.MMEIR@co.nevada.ca.us>

To:

Cc: Matt Kelley <Matt.Kelley@co.nevada.ca.us>

Date: 02/07/2022 12:56 PM

Subject: Updated Notice of Availability of a Draft Environmental Impact Report and Notice of Re-Scheduled Public Meeting to provide Comments on the Idaho-Maryland Mine Draft EIR



Good Afternoon:

Attached please find a copy of an updated Notice of Availability for a Draft Environmental Impact Report and a Notice of Re-Scheduled Special Public Meeting to provide comments on the Idaho-Maryland Mine Project EIR. This notice is to announce that the public comment period has been extended until Monday, April 4, 2022 at 5:00 p.m. to allow the public a total of 91 days to submit comments. This notice is to also announce that the Special Public Meeting before the Nevada County Planning Commission has been re-scheduled to March 24, 2022. The comment period has been extended due to the Winter Storm events in late December into January, which caused Nevada County residents to lose utility power and internet capabilities for an extended period of time

For more information, please see the attached revised Notice of Availability.

The Draft Environmental Impact Report and other project materials continue to be available for public review and comments on the Nevada County website at: <https://www.mynevadacounty.com/3195/Idaho-Maryland-Mine---Rise-Grass-Valley>

A printed copy of the Draft EIR is available for public review at the following locations during normal business hours. Due to the COVID-19 pandemic, the Planning Department highly recommends scheduling an appointment ahead of time to review the Draft EIR.

- Nevada County Planning Department, 950 Maidu Avenue, Suite 170, Nevada City, CA 95959 – (530) 265-1222, Option 2.

As a courtesy for public review, a printed copy of the Draft EIR with available Technical Appendices in

electronic format **may** be available for public review at the following library locations, **during normal**

**business hours and by appointment only. Please contact the individual library below for information on appointment availability.**





- Madelyn Helling Library, 980 Helling Way, Nevada City, CA 95959 – (530) 265-7078
- Grass Valley Library, Royce Branch, 207 Mill Street, Grass Valley, CA 95945 – (530) 470-2692
- Penn Valley Library, 11252 Pleasant Valley Road, Penn Valley, CA 95946 – (530) 388-8830
- Truckee Library, 10031 Levon Avenue, Truckee, CA 96161 – (530) 582-7819

A Special Public Meeting before the Nevada County Planning Commission will be held on March 24, 2022, beginning at 9:30 a.m. in the Board of Supervisors Chambers at the Eric Rood Administration Center, 950 Maidu Avenue, First Floor, Nevada City, CA 95959 to receive comments from public agencies and the public on the adequacy of the Draft EIR. Future notice of public hearings will be provided in accordance with Nevada County noticing requirements.

In adherence with Governor Gavin Newsom’s Executive Order, and the Nevada County Public Health Officer’s Order, pertaining to the convening of public meetings in response to the COVID-19 pandemic, please see the March 24, 2022, agenda after posting for the most updated information regarding the meeting format, as well as the various options being made available for public agencies and members of the general public to provide public comment. If there continues to be a high rate of COVID-19 spread within our community, the Planning Commission may attend the meeting and participate remotely to the same extent as if they were present.

**For information on how to participate in the Special Meeting, please see the Agenda, which will be available at least five (5) days before the meeting at:**

<https://www.mynevadacounty.com/AgendaCenter/Planning-Commission-10>

Seven (7) days prior to the Special Public Meeting, all documents pertaining to the proposed actions, Staff Reports and other supporting documents will be available for public review and consideration at the Nevada County Planning Department, 950 Maidu Avenue, Suite 170, Nevada City, CA 95959 or can be found online at: <https://www.mynevadacounty.com/517/Projects-Scheduled-for-Public-Meeting>.

Thank you.





**Matt Kelley**

*Senior Planner*



**Planning Department**

**County of Nevada**

**Community Development Agency**

950 Maidu Ave. Suite 170 office 530.265-1423

PO Box 599002

<https://www.mynevadacounty.com/512/Planning-Department>

Nevada City, CA 95959-  
7902

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*I am out of the office every other Friday as follows: 1/7, 1/21, 2/4, 2/18, 3/4...*

**PLANNING PUBLIC COUNTER NOTICE**

The Customer Service Counter for Nevada County CDA - Planning Department is open from 8:00am – 3:30pm for walk-ins and for appointments. To schedule an appointment with staff please contact the Planning Department at 530-265-1222 Option 2 or [planning@co.nevada.ca.us](mailto:planning@co.nevada.ca.us). If you have any questions about our services, please contact us by email at [planning@co.nevada.ca.us](mailto:planning@co.nevada.ca.us) or by phone at 530-265-1222 Option 2.



## **INDIVIDUAL LETTER 363: JIM WAHLER**

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### **Response to Comment Ind 363-1**

The comment is an introductory statement and does not address the adequacy of the DEIR.

### **Response to Comment Ind 363-2**

The commenter expresses general concerns regarding air, water, and noise but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 363-3**

Please see Master Response 3.

### **Response to Comment Ind 363-4**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 364**

**From:** Jim Wahler <jimawahler@comcast.net>  
**Sent:** Saturday, April 2, 2022 12:04 PM  
**To:** Idaho MMEIR; jim wahler  
**Subject:** From Jim Wahler, former City Planner, of Lake County, Illinois.

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Hello To County of Nevada,

My name is Jim Wahler. I was a City Planner for Lake County, Illinois, just north of Cook County in the Chicago area 50 years ago. The make up of Lake County was not unlike the density of Nevada County.

Ind 364-1

I was involved with developing a Land Use Plan for the county. It took 2 1/2 years to come up with our recommendations.

I assure you, if this kind of mine development were to be initiated in Lake County then or any other time since, it would never have made it to any type of stage 2 development.

**The 10 points outlined by the CEA foundation are completely true and accurate.**

Voting yes for this mine, would be a catastrophic decision for the future of Nevada County.

Ind 364-2

**If you do any research on where other gold mines are, say in the state of Nevada, you will find that not only is the density of population far less, the actual mining takes place 50-100 miles away from even any small town population.**

**Anyone who would vote yes on this mine, knowing the potential suicide it would bring to Nevada County air and water and energy usage, would be making a decision that would literally destroy this area for living safely for, not only the next 80 years, but probably FOREVER!!!**



Ind 364-3

I can't imagine who would vote yes on this mine and for what reason.  
No amount of money could compensate for the amount of irreversible  
damage that would occur for Nevada County and All its residents.

I could go on but what really is necessary is for the decision makers to  
wake up to the truth of the destructiveness of a gold mining operation in  
the back yard of a population that would be devastated for the rest of  
there lives and for generations to come.

**You can reach me at 530-274-2416.**

Sincerely,

Jim Wahler, resident of Grass Valley



## **INDIVIDUAL LETTER 364: JIM WAHLER**

---

### **Response to Comment Ind 364-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 364-2**

The commenter expresses general concerns regarding air, water, and energy but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1.

### **Response to Comment Ind 364-3**

Please see Master Response 1.





**Individual Letter 365**

24 March 2022

The Honorable Nevada County Planning Commissioners  
950 Maidu Ave  
Nevada City CA 95959

REF: DEIR, Dec 2021, Idaho Maryland Mine Project

Commissioners:

QUALIFICATIONS (in date order):

BA Semiconductor Physics, San Diego State University. Commercial Pilot, Flight Instructor, Airframe & Powerplant Mechanic with Inspection Authorization. Electronic Design Engineer, Surveyor & Apollo Moon projects, Viking Mars Soft Lander. Antenna & Instrumentation Designer on Voyager Earth Circumnavigation program, For the last 46 years the electronic and mechanical designer of FAA and FCC approved and installed electronic and mechanical apparatus for my own company at Nevada County Airport and distributed around the world. FCC approved type acceptance engineer.

Resident 46 years at the same location in Nevada County, roughly half a mile out Greenhorn from Brunswick and halfway between Brunswick and Loma Rica. Between half a mile and two miles from the current project surface sites.

43 years on the Sierra College faculty in the Electronic Technology/Computer Aided Design/ and Mechatronics programs at Rocklin, Grass Valley, and Truckee campuses. VP of the SC Faculty Association (2000-2014), Elected to the California Teachers Association State Council. Elected to the National Education Association Representative Assembly.

8 years on the Nevada County Board of Supervisors (District III) having dealt with dozens of these EIRs and projects including other gold mine proposals.

DISCUSSION #1.

In the call for preliminary comments (DEIR page 1-13), the concern was voiced (page 1-13) for the potential of sink holes. Sink holes are not uncommon where mining operations have taken place. No mining operation that I have ever studied could re-fill an underlying rock support system anywhere as good as Mother Nature did it several million years ago.

There has been zero response in the DEIR to this comment.

And what happens when a sink hold suddenly appears on a Nevada County Airport runway after the staff has gone home? Dark of night? As a flight instructor of several thousand hours, I can tell you that an aircraft landing light does little but find you the location of the runway and PERHAPS a decr or two on the runway. It certainly will NOT find you sink holes. I see no mitigation or even a nod to the possibility.

As the survivor of three aircraft forced landings, I can tell you that handling the emergency during the day is difficult. At night it is a gamble at best. The odds of an aircraft (and passengers) surviving a sink hole landing at night without injury is somewhere between zero and zip.

**RST Engineering**

13993 Downwind Court  
Grass Valley CA 95945  
530.272.2203 voice only  
www.rstengineering.com



Ind 365-1

Ind 365-2



DISCUSSION #2

In the call for preliminary comments (DEIR page 1-14) the concern was voiced (page 1-14) for airborne particulate matter (smoke, dust, grindings, etc.) contamination of Nevada County aircraft engine air filters to become contaminated to the point of engine failure when passing over the proposed project.

There has been zero response in the DEiR to this comment.

This is my 55<sup>th</sup> year in aviation maintenance. When the engine stops breathing, the engine stops turning. When the engine stops turning the propeller stops turning. The propeller is only there to keep the pilot cool, because when it stops, (s)he starts sweating like you cannot believe.

You cannot accept in the final EIR that there will not be any airborne particulates, and yet the proponent has not shown any data on particulate matter and the distribution of it around the site.

Just as a side matter, when I get an airplane in the maintenance hangar to inspect, I can tell from the air filter contaminants where the airplane is based. Gray, black, yellow, or brown, they are all representative of the pollution in the area where they are from. I'd prefer not to have a Nevada County contaminant signature.

Ind 365-3

DISCUSSION #3

My apologies. I never considered blasting when I thought about aircraft. And, since the DEIR has concentrated its responses on domestic housing effects, I thought you should consider the effect of blasting on stationary aircraft at Nevada County Airport

As I stated above, I have been designing aircraft electronic devices for a very long time. And, the FAA has given us guidance on shock and how we had to design our devices to handle it. I see nothing in the DEIR about the hundred or so aircraft populating Nevada County Airport and how they or cannot resist the shock of blasting.

We in the aviation electronics ("avionics") industry have been guided for dozens of years by documents produced by RTCA for the tests our devices should undergo for blasting and vibration. I have absolutely no idea whether or not the DEIR considered these criteria.

Just for their information, I include reference to RTCA document DO-138 (as amended and superseded) as the basis for this discussion.

Ind 365-4

Thank you for your time

Jim Weir  
RST VP Engineering  
Nevada County Supervisor III (Retired)



## **INDIVIDUAL LETTER 365: JIM WEIR**

---

### **Response to Comment Ind 365-1**

The commenter provides a summary of their background. The comment is noted.

### **Response to Comment Ind 365-2**

The commenter is concerned that the project will cause a sinkhole at the Nevada County Airport and the commenter states the DEIR fails to address the possibility at the airport. The project will not cause sinkholes in the airport runway. Near surface workings and subsidence are analyzed in Chapter 4.6 (Geology, Soils, and Mineral Resources) of the DEIR. The commenter is referred to Master Response 7 - Location of Future Mining Areas, and Master Response 29 - Near Surface Workings.

### **Response to Comment Ind 365-3**

The commenter states that the DEIR fails to analyze air quality impacts, specifically particulate matter. The DEIR analyzed particulate emissions in Chapter 4.3 and found the impacts to be less than significant after mitigation. (DEIR, p. 4.3-66.) The commenter is also referred to Master Response 18 - Air Quality Thresholds. Further, as stated on page 4.3-81 of the DEIR:

The project would be required to comply with NSAQMD Rule 207, Particulate Matter, and would implement APM-AQ-2, Surface Fugitive Dust Controls, which would limit the amount of dust generated during project implementation. By reducing the generation of fugitive dust through compliance with the foregoing NSAQMD rules and APM-AQ-2, emissions of PM<sub>10</sub> would be reduced to the maximum extent practicable and receptors would not be exposed to excess pollutant concentrations.

In addition, Mitigation Measure 4.3-2 states in part:

*For all earthmoving activities, at least one of the following methods of dust control shall be implemented, pursuant to (e)(4)(E) of the ATCM:*

- a. Pre-wetting the ground to the depth of anticipated cuts; and/or*
- b. Suspending grading operations when visible dust emissions from any aspect of the grading (including tires, fans, and exhaust) cross the property line.*

Contrary to the commenter's speculation, there is no evidence that the mine's operation would generate substantial airborne particulate matter.

### **Response to Comment Ind 365-4**

The commenter states that the underground blasting will damage aviation electronics at the Nevada County Airport. The DEIR analyzed the impact of blasting vibrations on sensitive electronic equipment at Analog Devices, which is much closer to the proposed mining activities than the Nevada County Airport. Underground blasting associated with the project would result in a less than significant vibration-related impact to Analog Devices. (DEIR, p. 4.10-55.) The commenter is also referred to Master Response 7 - Location of Future Mining Areas.



**Individual Letter 366**

**From:** Jimena Saravia <energylifedesign@yahoo.com>  
**Sent:** Monday, April 4, 2022 11:06 AM  
**To:** Idaho MMEIR  
**Subject:** DEIR comments

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**Ind 366-1**

I am a local resident who would be downwind from the Idaho-Maryland mine. Please don't approve this project. We cannot trust the government to do what's in our best interest. It's abhorrent that this is even being considered in the name of profit. I moved away from Oakland because of my asthma. I am so incredibly opposed to this project. Help us in keeping our air and water clean.

Thank you,  
Jimena Saravia



## **INDIVIDUAL LETTER 366: JIMENA SARA VIA**

---

### **Response to Comment Ind 366-1**

Please see Master Response 1. The commenter expresses general concerns regarding air and water but does not specifically address the adequacy of the DEIR.





**Individual Letter 367**

**From:** Joan Goddard <joango@icloud.com>  
**Sent:** Thursday, March 31, 2022 3:49 PM  
**To:** Idaho MMEIR  
**Subject:** EIR lacking

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Mining was Nevada County's past but it should not be our future! We all live in a beautiful rural community which has become a tourist destination enjoyed by visitors and citizens alike. We want to protect the precious resources we have so that our children and their children can thrive here.

The EIR is faulty; the company wanting to exploit the land is sketchy and putting out misinformation in glossy brochures; and worst of all, we are experiencing historic drought and accompanying fires. Our air pollution in this area is much too high and will only be exacerbated by the mining.

There has been so much information put out by knowledgeable people on the risks and uncertainties. I only hope those of you considering "what is best for the community" will not cave in to false promises and pipe dreams.

Joan Goddard  
30-year resident  
Co-founder of Conflict Resolution Center Co-founder of Sierra Foothill Village  
20 years on the Board of InConcert Sierra Local psychotherapist in private practice

Sent from my iPad

**Ind 367-1**



## **INDIVIDUAL LETTER 367: JOAN GODDARD**

---

### **Response to Comment Ind 367-1**

Please see Master Responses 1 and 3. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR.



**Individual Letter 368**

**From:** [Joan Reynolds Griffin](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** Fw: Proposed mine  
**Date:** Saturday, March 19, 2022 9:25:33 AM

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[Sent from the all new AOL app for iOS](#)

Begin forwarded message:

On Friday, March 18, 2022, 6:21 PM, Joan Reynolds Griffin <[jreynoldsbotany@aol.com](mailto:jreynoldsbotany@aol.com)> wrote:

Dear Matt Kelley,

**Ind 368-1**

I am a resident of Nevada City, a botanist, and I have worked for the gold mining industry in Nevada and California for over 30 years. Although my utmost concern about the proposed mining venture at the Idaho Maryland mine site is the amount of water that will be used for the mining venture, I also know from experience that the area will be impacted beyond repair regardless of what bonds or reclamation requirements are implemented.

**Ind 368-2**

During my career as a field botanist for many mines throughout Nevada, I performed both pre-mining botanical surveys to search for botanical resources for environmental documentation, as well as reclamation monitoring for post mining rehabilitation. The amount of environmental damage that consistently occurs during the gold mining ventures never recovers the landscape to the level prior to the ventures to mine for gold. It is an environmental tragedy which typically enables a few to receive capital gain, most of which are from another country. The local economic gain is always short if at all, and the people who see the economic benefits do not contribute to the local economy. The resource demands and damage far out way the benefits to the local area, community and environment.

**Ind 368-3**

The traffic, noise, air quality impacts are also huge concerns for the residents who reside near the proposed mine location, not to mention the potential for the water table to drop and impact wells throughout the area. Our people in our community need all the water we have, especially during these intense drought and climate change conditions.

Please stop the mining proposal in its tracks for the Idaho Maryland Mine.

Thank you.  
Sincerely,  
Joan Griffin  
14201 Idaho Maryland Road  
Nevada City, CA. 95959



## **INDIVIDUAL LETTER 368: JOAN GRIFFIN**

---

### **Response to Comment Ind 368-1**

Please see Master Response 1 and the discussions and analyses in Chapter 4.8, Hydrology and Water Quality, and Chapter 4.11, Public Services and Utilities, of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 368-2**

Please see Master Responses 2 and 3.

### **Response to Comment Ind 368-3**

The commenter expresses general concerns regarding traffic, noise, and air quality but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.



**Individual Letter 369**

**From:** [Dovetail Services](#)  
**To:** [Julie Patterson-Hunter](#)  
**Subject:** Re: Let the people vote  
**Date:** Wednesday, January 26, 2022 10:24:24 AM  
**Importance:** High

Hi Julie,

My message was this:

Please, the mine is too big an issue for a few people to decide. At least send it to a local popular vote.

Best,  
Joan Keyes & Jonathan Peck

Dovetail Publishing Services  
11159 Alpine Lane  
Grass Valley, CA 95945  
530-272-1990 phone  
530-272-8300 fax

Ind 369-1

On Jan 26, 2022, at 9:45 AM, Julie Patterson-Hunter <[Julie.Patterson-Hunter@co.nevada.ca.us](mailto:Julie.Patterson-Hunter@co.nevada.ca.us)> wrote:

Good Morning -  
I received your email, but I am unable to open links and/or attachments from unknown sources.  
If you could send me the information in a manner that is not linked or attached I will be able to provide it to the Board members.  
Thank you,

Julie Patterson Hunter, CCB  
Clerk of the Board

-----Original Message-----

From: Dovetail Services <[jk-ip@dovetailpublishingservices.com](mailto:jk-ip@dovetailpublishingservices.com)>  
Sent: Tuesday, January 25, 2022 10:46 PM  
To: bdofsupervisors <[bdofsupervisors@co.nevada.ca.us](mailto:bdofsupervisors@co.nevada.ca.us)>  
Subject: Let the people vote

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## **INDIVIDUAL LETTER 369: JOAN KEYES AND JONATHAN PECK**

---

### **Response to Comment Ind 369-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 370**

**From:** Dovetail Services <jk.jp@dovetailpublishingservices.com>  
**Sent:** Wednesday, January 26, 2022 10:24 AM  
**To:** Julie Patterson-Hunter  
**Subject:** Re: Let the people vote

**Importance:** High

Hi Julie,

My message was this:

Please, the mine is too big an issue for a few people to decide. At least send it to a local popular vote.

**Ind 370-1**

Best,  
Joan Keyes & Jonathan Peck

Dovetail Publishing Services  
11159 Alpine Lane  
Grass Valley, CA 95945  
530-272-1990 phone  
530-272-8300 fax

On Jan 26, 2022, at 9:45 AM, Julie Patterson-Hunter <[Julie.Patterson-Hunter@co.nevada.ca.us](mailto:Julie.Patterson-Hunter@co.nevada.ca.us)> wrote:

Good Morning -  
I received your email, but I am unable to open links and/or attachments from unknown sources.  
If you could send me the information in a manner that is not linked or attached I will be able to provide it to the Board members.  
Thank you,

Julie Patterson Hunter, CCB  
Clerk of the Board

-----Original Message-----

**From:** Dovetail Services <[jk.jp@dovetailpublishingservices.com](mailto:jk.jp@dovetailpublishingservices.com)>  
**Sent:** Tuesday, January 25, 2022 10:46 PM  
**To:** bdofsupervisors <[bdofsupervisors@co.nevada.ca.us](mailto:bdofsupervisors@co.nevada.ca.us)>  
**Subject:** Let the people vote

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## **INDIVIDUAL LETTER 370: JOAN KEYES AND JONATHAN PECK**

---

### **Response to Comment Ind 370-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 371**

**From:** [Dovetail Services](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** Rise Gold Mine  
**Date:** Friday, March 11, 2022 1:39:26 PM

**Ind 371-1**

Dear people making this decision,

This mine is the worst idea ever. I don't need to outline the possible bad affects this will have on our community. A few jobs for a few years and some tax income is not worth the risk of destroying the paradise where we live. We are already still dealing with the effects of the last gold mining operations including on just from the 1990s.  
<https://www.theunion.com/opinion/columns/jonathan-keehn-the-siskon-mine-well-disaster/>.

**Ind 371-2**

No matter what the impact report says, this company is not to be trusted. You only have to look at their Canadian record to see what folly it would be for us to have a mine here.  
<https://www.minewatchnc.org/shouldnt-trust-rise-gold>.

**Ind 371-3**

Poisoned streams; drained wells; environmental havoc; noisy, heavy, stinky trucks tearing up the roads; traffic; noise! We don't need any of it! Please read the letters to the editor in *The Union*. The vast majority of residents in Grass Valley and Nevada City do NOT want this mine to open. <https://www.theunion.com/search-results/?q=rise+gold&range=2021-12-11>.

Please, we beg you—vote NO. Do you want to be held responsible for making a horrendous decision that could ruin our community and beautiful lands for decades or longer?

**Ind 371-4**

Best,

Joan Keyes & Jonathan Peck  
Dovetail Publishing Services  
11159 Alpine Lane  
Grass Valley, CA 95945  
[jk-jp@dovetailpublishingservices.com](mailto:jk-jp@dovetailpublishingservices.com)



## **INDIVIDUAL LETTER 371: JOAN KEYES AND JONATHAN PECK**

---

### **Response to Comment Ind 371-1**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 371-2**

Please see Master Response 3.

### **Response to Comment Ind 371-3**

Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 371-4**

The comment is a conclusion and does not address the adequacy of the DEIR.





**Individual Letter 372**

**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means creating new jobs and careers with an average expected annual income of \$45,000. The mine will also spur an additional \$10 million in business in the area. This project will enhance the local economy by providing jobs for county workers and their families and help build stable and prosperous communities.



Ms. Joan Robertson  
PO Box 126  
Cedar Ridge, CA 95924-0126

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) \_\_\_\_\_  
Address \_\_\_\_\_  
Phone \_\_\_\_\_  
Email Address \_\_\_\_\_

*Mc Mine*

Ind 372-1



## **INDIVIDUAL LETTER 372: JOAN ROBERTSON**

---

### **Response to Comment Ind 372-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 373**

**From:** Joanna Pedroncelli <mikolouise924@icloud.com>  
**Sent:** Monday, April 4, 2022 12:49 PM  
**To:** Matt Kelley  
**Subject:** Idaho Mine Opposition Plea

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Dear Mr. Kelley,

I am writing as a citizen of Grass Valley who is extremely concerned about the proposal to re-open the Idaho-Maryland Gold Mine. My husband and I moved to Grass Valley in 2018 to be closer to his family but the main attraction to this area was the magnificent wild beauty and small town friendly charm. We have been so happy here and though my husband has been battling cancer for 18 months, we feel strongly that living here has been a healing boost for its peaceful, scenic beauty and welcoming community.

**Ind 373-1**

History has proven that a gold mine cannot be operated without a tragic permanent devastation to the surrounding environment. Mining affects everything and everyone in proximity for many generations to come. I plead with you and your fellow Board to protect our town and its citizens. The short term financial gain, if any, will be overshadowed by the loss of our clean water and personal wells, natural wild life community, quiet neighborhood, lack of traffic and pollution and the decline of property values.

**Ind 373-2**

Will the Canadian Rise Gold Company be financially responsible for the devastation they will cause by the simple fact of operating their business? I would like to see the DEIR

**Ind 373-3**

Who is going to replace the millions of gallons of water our community will lose to toxic contamination when we already have a drought and water is precious as it is?

**Ind 373-4**

How long will the soil be contaminated by the tailings? Who cleans that up and how?

**Ind 373-5**

In an ever decreasing realm of wilderness, what will become of the wildlife that currently inhabit the many acres which will be affected by the mine? How many species of animals will be displaced or lose their life due to mining operations?

**Ind 373-6**

Who wants to visit a town or live near a gold mine causing loud truck traffic and fumes from diesel engines running all day, not to mention increased traffic? What impact will this have on our town?

**Ind 373-7**

What is the upside of reopening the mine, except for the Canadian company's financial gain? The economic losses due to lowered real estate values, less tourism, more pollution and a declining quality of life to the citizens of the area will be much greater.

Thank you for your time.

Sincerely,  
Joanna Pedroncelli



16753 Greenhorn Road  
Grass Valley, CA 95945  
707-239-1202  
[mikolouise924@icloud.com](mailto:mikolouise924@icloud.com)



## **INDIVIDUAL LETTER 373: JOANNA PEDRONCELLI**

---

### **Response to Comment Ind 373-1**

The commenter opposes the project on the basis that the economic benefits are outweighed by the environmental impacts. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

### **Response to Comment Ind 373-2**

This comment references the Project Applicant and does not concern the adequacy of the DEIR. The commenter is referred to Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 373-3**

The commenter is concerned that the project will contaminate groundwater. However, the water in the Idaho-Maryland Mine does not supply private wells and the project would treat the water pumped from the Idaho-Maryland Mine to state standards (Central Valley Regional Water Quality Control Board) under state permitting, which would improve the water currently in South Fork Wolf Creek. DEIR Chapter 4.8 (Hydrology and Water Quality) found that impacts associated with the dewatering, treatment, and discharge process would be less than significant after mitigation. (DEIR, p. 4.8-41.) The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 - Drought and Climate Change, and Master Response 35 – Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 373-4**

The commenter asks how long the soil will be contaminated by the tailings and who will remediate the site, but it is unclear what site the commenter is referring to and which waste (e.g., existing waste at the Centennial Industrial Site or engineered fill). The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA, Master Response 8 - Mine Waste Characterization, and Master Response 9 – Historical Mine Waste at the Centennial Site.

### **Response to Comment Ind 373-5**

The commenter is concerned about the wildlife that inhabits the area of the project site. The DEIR states that impacts to special-status wildlife species would be less than significant. The commenter is referred to Master Response 37 – Birds and Raptors, and Master Response 38 – Foothill Yellow Legged Frog and California Red Legged Frog.

### **Response to Comment Ind 373-6**

The commenter is generally concerned about traffic and air quality impacts but does not provide any additional information on which to formulate a specific response. The DEIR found that all traffic-related impacts (with the exception of traffic at the SR 174/Brunswick Road and Brunswick Road/Sutton Way intersections) would be less than significant. (DEIR, p. 4.12-54, 67, and 69.) Regarding air quality impacts, the commenter is referred to Master Response 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criterion Pollution Thresholds during Operations. As stated in the Health Risk Assessment (HRA) performed for the project (see Appendix B of Appendix E.1 to the DEIR), for diesel haul trucks, estimated maximum daily trips were multiplied by 365 days to estimate annual trips. For all other trucks, daily emissions were estimated based on the anticipated maximum daily truck trips, and annual emissions were estimated based on anticipated average trips per week multiplied by 52 weeks per year. Total truck trips assumptions for the HRA are shown in HRA Table 7. Based on the HRA, which includes all construction and





operational TAC sources of the project, the health risk to the maximally exposed individual resident (MEIR) would be less than significant after implementation of mitigation.

**Response to Comment Ind 373-7**

The commenter opposes the project because of perceived adverse economic and social impacts. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.



Individual Letter 374

**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers, with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Joanne Drummond  
Address 11148 Lower Circle Dr ZIP 95949  
Phone 530-913-7757  
Email Address jdummond gv@hotmail.com

Impact on  
mining  
in  
other  
locations  
is  
horrible  
our reg's make this  
certified GOLD.

Ind 374-1



## **INDIVIDUAL LETTER 374: JOANNE DRUMMOND**

---

### **Response to Comment Ind 374-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 375**

**From:** jevers888@gmail.com  
**Sent:** Friday, April 1, 2022 12:50 PM  
**To:** Idaho MMEIR  
**Subject:** Rise Mine

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Dear Supervisors,

We have been residents of Nevada County since 2007. We have had issues with our well on and off from lack of water due to drought the entire time we have lived in Nevada County. Our well got so bad one year we were having red soil sediment flow into the house and were looking into having to drill a second well. I've heard of this same story, as you have, throughout Nevada County over the years.

**Ind 375-1**

With the proposed project of Rise Mine I am concerned about the 107,000 gallon a day project use of water. According to the DEIR and Raney Report/Assessment, most of which comes from Rise's own research, the Mine will be using NID water, ground water, and local municipal water. As you know the dewatering process of drilling below the water table will necessitate Rise Mine dumping large amounts of water into the south fork of the Yuba river, 10% of water use, so they estimate, or 10,700 gallons a day, 3,852,000 gallons per year.

**Ind 375-2**

Again, these reports were not supplied by independent sources. Rise even claims that they will even be making more water than they use! As you also know from the reports that Rise will not be responsible for flooding, damages, culverts or any other infrastructure improvements along the South Fork as it dumps its pumped water out into a location off of Brunswick and highway 49 on its way towards Grass Valley.

**Ind 375-3**

My concern is that the water will create flooding in Grass Valley especially in the winter months, as the mine plans to run 24/7, and most importantly, all that desperately needed water will simply flow down the hill to the valley by gravity. I worry that we will have less water for our homes, our wells, and our ever worsening wildfires in the summer and fall.

As stewards of our community I find it astonishing that you have all voted in favor of the DEIR for Rise and essentially this mine project.

With regret,  
Joanne Evers  
Susan Greenawald

Sent from my iPhone



## **INDIVIDUAL LETTER 375: JOANNE EVERS AND SUSAN GREENAWALD**

---

### **Response to Comment Ind 375-1**

Please see Master Responses 14 through 16 regarding groundwater, and 35 through 36 regarding discharge to South Fork Wolf Creek. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 375-2**

See Response to Comment Ind 375-1. All reports submitted by the applicant were independently peer reviewed by a third party hired by the County.

### **Response to Comment Ind 375-3**

Please see Chapter 4.8, Hydrology and Water Quality, of the DEIR, which evaluates potential impacts related to flooding that could occur as a result of the proposed project. Please see Master Responses 14 through 16 regarding groundwater, and 35 through 36 regarding discharge to South Fork Wolf Creek. See Master Response 6 regarding wildfire.

The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. See Master Response 1.





**Individual Letter 376**

**From:** Julie Patterson-Hunter  
**To:** "Irishousestudios@yahoo.com"  
**Subject:** RE: FARSIGHTED  
**Date:** Monday, March 21, 2022 12:14:00 PM  
**Attachments:** im.aae901.enq

Thank you – your email has been received

Julie Patterson-Hunter, CCB  
Clerk of the Board



Dist 4

**From:** Joanne Wohlfeld <Irishousestudios@yahoo.com>  
**Sent:** Saturday, March 19, 2022 9:58 AM  
**To:** Webmaster <Webmaster@co.nevada.ca.us>  
**Subject:** FARSIGHTED

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**Ind 376-1**

To: Board of Supervisors; A very interesting (non fiction) book I read and urge everyone on the board to take a look at it if not already is "Farsighted" how we make the decisions that matter the most by Steven Johnson.  
Here is a page at the beginning of the book. Please don't let an opening of a mine (Rise) to happen in this County.



Ind 376-2

### THE FIVE-HUNDRED-YEAR MISTAKE

The story of Collect Pond is, in part, a story about a decision, or about two decisions, really. The decisions did not coincide directly in time, and neither was adjudicated by a single individual. But for the sake of shorthand we can compress them down into a simple binary: Should we preserve Collect Pond by turning it into a public park, or should we erase it? The consequences that trailed behind in the wake of that decision continue to affect the daily experiences of New Yorkers who live and work in the neighborhood today, more than two centuries later. Today, the land that was once occupied by the menacing crowds of Five Points now hosts a more wholesome, but not exactly lively, collection of government buildings and quotidian office towers. But imagine a Lower Manhattan that harbored a green oasis, perhaps the size of Boston Common, featuring a picturesque pond bordered by a rocky bluff that rivaled the heights of the man-made structures around it. We like to romanticize the Five Points era now, but the gangs of New York would have found somewhere else to assemble if the city hadn't filled the pond. The sudden drop in real estate prices that those subterranean microbes triggered certainly helped attract the immigrants who would make the city a truly cosmopolitan center, but there were other forces driving that population influx beyond the cheap housing in Five Points. City neighborhoods are still capable of great demographic and architectural change, reinventing themselves every few generations. Once you bury the pond, it never comes back. If DeWitt Clinton's plan had been put in place, it's entirely likely that Collect Pond Park would today stand as one of the great urban



## **INDIVIDUAL LETTER 376: JOANNE WOHPELD**

---

### **Response to Comment Ind 376-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 376-2**

The comment provides a scanned excerpt of a non-fiction book in support of the sentiments expressed in Response to Comment Ind 376-1 and does not address the adequacy of the DEIR.



**Individual Letter 377**

**From:** [John A](#)  
**To:** [BCS Public Comment](#)  
**Subject:** No Mine!!  
**Date:** Sunday, February 27, 2022 2:13:39 PM

Dist 1

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**Ind 377-1**

On behalf of all my neighbors and my family here on Pinewoods on the border of Nevada City / Grass Valley,  
NO No NO  
Mine!!

Thank you!

John Alevizakis



## **INDIVIDUAL LETTER 377: JOHN ALEVIZAKIS**

---

### **Response to Comment Ind 377-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 378**

**From:** [John A](#)  
**To:** [bcbsupervisors](#)  
**Subject:** No Mine PLEASE!  
**Date:** Monday, January 31, 2022 12:27:18 PM

Dist 1

**CAUTION:** This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**Ind 378-1**

All our neighborhood, off Good Flat, opposes the opening of the mine...  
we're passionate about the health of our community and the sustainability of our town.  
Please shut down any further efforts to reopen, Thank you,  
  
John Alevizakis  
Sneath Clay Rd, Nevada City



## **INDIVIDUAL LETTER 378: JOHN ALEVIZAKIS**

---

### **Response to Comment Ind 378-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 379**

**From:** John A <littlebuddhastudio@yahoo.com>  
**Sent:** Sunday, March 27, 2022 7:07 AM  
**To:** Idaho MMEIR  
**Subject:** No Mine!

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For so many reasons, far FAR outweighing any positive ones, my family and neighborhood strongly OPPOPSE re -opening the mine. On behalf of our entire community...

Thank you!

John Alevizakis  
Sneath Clay Rd  
Nevada City

**Ind 379-1**



## **INDIVIDUAL LETTER 379: JOHN ALEVIZAKIS**

---

### **Response to Comment Ind 379-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 380**

**From:** [John D.](#)  
**To:** [Clerk of Board](#)  
**Subject:** Proposed Gold Mine opening  
**Date:** Friday, February 4, 2022 10:00:27 AM

Dist 1

**CAUTION:** This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**Ind 380-1**

Dear Board of Supervisors,

I've only lived in Nevada County 21 years, but have read extensively about both my county and mining operations in the United States. Put my and my family's name firmly in the column of "object to the proposed reopening of the Idaho-Maryland Mine". It's a NIMBY objection based upon research.

Sincerely,  
John Deam  
14844 Craig Lane, Grass Valley, CA 95945





## **INDIVIDUAL LETTER 380: JOHN DEAM**

---

### **Response to Comment Ind 380-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 381**

John Fischer  
13516 Winterwood Lane  
Nevada City , Ca 95959

Nevada County Planning Dept.  
Attn: Matt Kelly  
950 Maidu Ave, Suite 170  
Nevada City , Ca 95959

**Ind 381-1**

Regards: Idaho Maryland Mine Project

Dear Mr. Kelly

I'm sad that I have to write this letter , I would think the powers that are in place would have all ready denied this project .

**Ind 381-2**

Please consider the of lack the water and the stress this will cause this community in lack of resources .

We have the joy of living in place where we can get our drinking water from our wells. Why make problems for people who lived here and have established wells . For the sake of few jobs and profit to people in another country !!!!!

**Ind 381-3**

I beg you vote NO NO NO on this project of destruction of our community. We don't need the noise and pollution of trucks rolling up and down our already well used highways ..

Best Reagrds

John Fischer



## **INDIVIDUAL LETTER 381: JOHN FISCHER**

---

### **Response to Comment Ind 381-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 381-2**

Please see Master Responses 2, 3, and 13 through 15.

### **Response to Comment Ind 381-3**

Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.



**Individual Letter 382**

**Comments on Draft EIR**

CONCERNING IDAHO-MARYLAND MINE PROJECT

SUBMITTED TO NEVADA COUNTY PLANNING DEPARTMENT

JOHN F. HAVERTY  
APRIL 3, 2022



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## 1. Summary

### 1.1. Identity

My name is John Haverty. I have lived in Nevada County since 2014, in the Forest Knolls region of lower Banner Mountain, and in California since 1990.

Although I am now retired, I spent most of my career working as a consultant in the computer field, for several different companies, both as a manager and individual contributor. I have undergraduate and graduate degrees in Electrical Engineering from MIT. I have several decades of personal experience in the business and technical aspects of consulting. Most recently I also consulted as an expert witness in a patent litigation, and prepared several reports as part of that work.

I also have personal experience with the impacts of Mining, from my family experience while growing up, in the area of central Pennsylvania where my ancestors settled. Although that area involved mining anthracite coal, much of the aspects of environmental impact may be similar to those of the "hard rock mining" that will be performed in the Project.

Additionally, I served 6 years in an elected position as a Board Member of a California Special District. Thus I have some understanding of the pressures, and constraints, under which public officials must operate.

I am not being compensated for creating this report, other than satisfaction in acting as a citizen of the area.

### 1.2. Position

I have not yet formed a position on the Mine Project. It is a complex situation with long-lasting effects on our community, both pro and con. A decision to proceed or not, and selection of the most appropriate Alternative, demands gathering as much information as possible before making a decision with such long-lasting effects. The EIR is one important component of that information.

As requested, my Comments address only the Adequacy aspects of the Draft EIR. I have tried to present no opinions on the accuracy of the EIR or the data it presents.

### 1.3. Adequacy of Draft EIR

The Draft EIR is quite detailed and lengthy, and contains much information in support of its conclusions. However, in my opinion, the information and analysis presented in this Draft is insufficient to warrant any conclusions or subsequent decisions. The Draft EIR is inadequate for those purposes, for the following reasons:

- **Time Scale:** An EIR is expected to detail the impact that a Project will have on the environment, i.e., compare the two scenarios of the future, one where the Project happens, and the other where it does not. This EIR seems to compare the Project scenario with the scenario of the local environment today, or in the very near term. The Project projected lifetime is 80 years. It should be evaluated in comparison to an 80-year projection of the Grass Valley area without the Project, but including all other changes that can be reasonably predicted over that timeframe.

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- **Alternative Outcomes:** The EIR seems to consider only one scenario for the Project where everything goes according to plan and the Project operates for many decades. There are many other possible, and perhaps more likely, scenarios which should be evaluated.

**Ind 382-4**

- **Local Conditions:** Although the EIR is comprehensive with its inclusions of many aspects of an environment, I find that it is quite generic in its structure. I know from experience that this is a common practice in Consulting, to make it easier to generate comprehensive reports by exploiting the commonality across many projects. However, this makes it easy to miss some of the situations specific to a particular Project, which can have significant environmental impacts. I have found several aspects of the Grass Valley environment which have apparently not been considered in the EIR analysis.

**Ind 382-5**

- **Incomplete Analysis:** The technical aspects of impacts on the environment are necessarily complex and interrelated. Using my personal experience, I have noticed some technical aspects that can affect the environment but which I haven't found to be addressed in the EIR.

The EIR document is sizable and addresses many different areas of possible concern, and I have not been able to exhaustively review and consider all of its information. However, the aspects that I have noted above, and provide a few detailed examples below, bring me to question the Conclusions of the report. Additionally, I have only used my personal experience to focus on issues that I have encountered where I have some background and expertise. There may be other similar inadequacies in other areas of the EIR's analyses that other reviewers may have reported in their comments.

**Ind 382-6**

In addition, my comments are based on a likely inadequate reading of the Draft EIR, with more than 1000 pages of information. If some inadequacy that I note has actually been addressed in the Draft EIR, and I simply have not yet found it, I apologize for my error.

**1.4. Recommendation**

In my opinion, the Draft EIR is inadequate in providing an accurate comparison of the Grass Valley environment with and without the Project. I recommend that the Draft EIR be rejected as inadequate, and a revised EIR be prepared which addresses all of the reasons cited above, plus others which other reviewers may have identified. With such a report, an informed decision can be better made to identify which of the various Alternatives is best for everyone.

In the sections which follow, I provide some details for each of the reasons summarized above.



## 2. Time Scale

### 2.1. Known Projects

The Draft EIR itself identifies changes to the local Environment, and notes that such changes are not yet even defined since they are still in the planning stage and need to be completed, receive government approval, and be implemented.

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One example is the "DTSC Cleanup Project" mentioned in the Introduction section of the Draft EIR. A plan has been developed, based on tests done in the area to determine what cleanup procedures will be needed. The plan however has not yet been approved, and may change before it can even be initiated.

As with any construction project involving excavation, only when the actual digging is performed will the actual conditions under the surface be known. If unanticipated conditions are discovered as the cleanup proceeds, the plan may have to be modified to accommodate the actual site situation rather than the situation expected when the plan was developed.

The Draft EIR makes some assumptions that seem risky. One example is its assumption that the Cleanup plan as known today will be approved. It assumes also that the plan as known today will be executed with no significant changes needed when site conditions are exposed with digging.

Basically, the Draft EIR recognizes that the environment is going to change as tasks such as the Cleanup Project are actually performed, and it assumes that the new conditions after the Cleanup will be as expected from the current plan which is not yet either approved or begun. The Draft EIR assumes that the Cleanup will simply go as planned, and bases its analysis and conclusions on that questionable assumption.

### 2.2. Planned Projects

The Draft EIR in some places recognizes that the environment of Grass Valley is changing, with numerous Projects in various stages of implementation. Driving around the area, one can observe several construction sites in progress. Other Projects are at various stages of the planning process, such as the Dorsey Marketplace. Others are still conceptual.

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Such changes are happening as the area grows. We can't know which of the Projects will actually complete, especially those in planning or concept. But it seems reasonable to expect that some of these Projects will occur. Over the 80-year lifetime anticipated by the Draft EIR, it seems likely that many such Projects will be approved and implemented, bringing more people, jobs, and commercial activity to the area.

Other ongoing activities within the Grass Valley area can be expected to change the environment even before the Project is initiated. For example, there has been much activity over the past few years to mitigate wildfire danger by removing trees and brush accumulated over many years. Federal, state, and local agencies are clearing public lands. Residents are clearing their properties. Significant time and expense is altering the landscape of the area around the Project site.

State and local laws and regulations have been enacted recently to mandate such activities. For example, there are regulations now for roadways that require a 10 foot clearance on the side of roadways, free of all flammable material.





**Comments on Draft EIR**

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Efforts to comply with such regulations can be seen all over the County. But there is still much work to be done, and it is easy to find locations that do not yet conform to the standards. But as the hundreds of loads of brush being collected recently indicate, people are working on it. As they do, they are changing the environment.

**2.3. Effects**

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Such changes have many effects on the area of Grass Valley, and will create a new Environment in which the Mine Project should be evaluated. I will highlight a few of the changes that should be considered in the EIR.

**2.3.1. Changes in Demographics**

The Draft EIR, in mentioning some of the various ongoing projects in the community, notes that they will cause "significant changes", regardless of whether or not the Mine Project happens.

Yet the same report, in other sections, fails to recognize that those significant changes will happen. For example, the Transportation analysis of section 4.12 has extensive detail of "Existing Conditions", and then uses those Conditions to evaluate how the Mine Project will impact traffic flows.

**Ind 382-10**

By its own admission in other sections, today's Existing Conditions will undergo "significant changes" as Grass Valley evolves, even without the Mine Project happening. As more housing is built, the population will shift. As more services and destinations, such as a shopping area, appear, traffic patterns will change.

The Draft EIR performs an analysis by comparing an Environment which will not exist, i.e., today's Environment, with the same Environment but including the Mine Project, as indicators of the Environmental Impact over the next eighty years. Neither of those Environments is likely to match the reality of what will exist, even in the near future, as unrelated ongoing projects change the Grass Valley Environment. It similarly does not address the Environment which will exist as Grass Valley naturally evolves but includes the Mine Project.

Such an analysis of situations that will not actually occur seems of dubious value in making decisions.

**2.3.2. Changes in Physical Conditions**

Community projects such as I've described have a common characteristic which is relevant to the EIR analysis. Such projects change the physical landscape. They often involve modifications to the land itself, such as grading and road construction.

**Ind 382-11**

In addition, such projects often involve removal of significant amounts of trees and brush. In doing so, they introduce new "view" scenarios, where people are now active in areas that were previously vacant. They also change the views of areas surrounding each such project, as people there can now see through areas which were previously covered by trees and brush.

Also, removal of trees and brush has a significant impact on the behavior of sound. Foliage acts as a barrier to sound, limiting its travels through the community. With the foliage removed, sounds can propagate farther and be louder than before.

From personal experience, I have seen such effects. Our local community has been quite active over the last few years in clearing trees and brush to address fire safety. As a result, our

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↑ neighbors can now see and hear each other, as well as hear the road and freeway noise, much better than just a few years ago. Such is the price of fire safety.

The Draft EIR similarly analyzes Sound and Vibration using Site Conditions today, rather than those that will exist in the Grass Valley area as it evolves, even over the next few years before the Mine Project could actually begin operation.

The analysis, e.g., of "Sound and Vibration" concludes that effects of the Mine Project will not be of significance. But such a conclusion is based on the Site Conditions today, not those that will exist even in the near future.

Such conclusions are also of dubious value for making decisions.

**2.4. Inadequacy of Draft EIR**

The Draft EIR compares two scenarios: the Grass Valley area as it exists today, and the same situation as it would exist with the Mine Project. Neither situation is what may actually exist even in the next few years, and the Draft EIR shows no justification for the accuracy of the "today" scenario as representative of future conditions.

Because it analyzes situations which are not the actual ones that may exist, all of the evaluations and conclusions regarding the Significance of environmental impacts of the Mine Project on Grass Valley are of questionable value, and should not be used for guiding decisions.





### 3. Alternative Outcomes

#### 3.1. Corporate and Government Responsibilities

As a corporation, any Project management has a primary responsibility to its Owners and Investors, to deliver the promised financial returns as well as to follow federal, state, and local laws and regulations while doing so.

Corporations in general use many techniques to meet their Fiduciary Duty and protect their Owners and Investors regardless of how a Project progresses. Legal mechanisms are used to limit liability. Insurance is obtained to avoid unexpected expenses. Contracts, including Permits, are carefully negotiated to provide best conditions for the Owners and Investors, no matter what happens as the Project proceeds.

During the Project lifetime, the management has a fiduciary responsibility to its Owners and Investors, to make decisions and take actions that bring maximal benefit to them, reacting to any and all situations that may occur, whether predicted or unexpected.

Governments accept their own responsibilities as part of granting Permits. They must of course provide for all of the oversight, monitoring, and other such activities to assure that the Project is being performed as required by laws and agreements captured in the Permit. But in particular, they must also absorb the effects of any impacts of a Project beyond those absorbed by the Corporation. That includes not only impacts during a Project's lifetime, but also those that appear, or endure, after the Project ends and the Corporation is no longer involved. Government responsibilities are typically not covered by any kind of insurance, other than perhaps whatever is covered by bonds required of the Project itself. All other effects, financial and otherwise, are absorbed by the government, i.e., by the general population.

Governments have a similar responsibility to take necessary actions, and to find funds to perform those actions, but their responsibility is not limited to the Project lifetime. It is a continuous and perpetual responsibility as agents for the general population.

#### 3.2. Alternative Timelines

The Draft EIR summarizes the plan for the lifetime of the Project and beyond.

*"The proposed project would reinstate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80 year permit period with gold mineralization processing and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations. Following completion of mining and processing activities, the project sites would be reclaimed to open space and land suitable for future development of industrial uses."*

This represents a "best case" scenario for the Project, where everything works as expected. This is the case that the Draft EIR analyzes.

However, especially over an 80 year timeframe, is it realistic to expect that everything will go as planned?

- Accidents can be expected to happen, possibly with consequences of liability and expenses that make the project no longer financially viable;
- Rules, regulations and laws may change, at local, state, or federal levels, which similarly affect the Project's viability;

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- Previously unknown consequences of the Project activities may be discovered, that have not been addressed in mitigation measures;
- Standards for mitigation measures may become more burdensome in reaction to new information about how the environment is affected by the Project operation,
- Project management may make poor business decisions that render the Project financially unsustainable
- Previously unknown conditions in and around the Project site may be discovered, rendering the planned mitigation measures ineffective

Over an 80 year timeline, such surprises become more and more likely. Eighty years is a long time. Some of the surprises noted above might only be recognized after the 80 years is past and the Project has terminated. Some may never happen. But the longer the timeline, the more likely that some surprise will occur, and the likelihood of the "best case" scenario of the Draft EIR diminishes.

In response to any of those or other "surprises", Project management must still meet its primary responsibility to the Owners and Investors. The ultimate "mitigation" measure is to prematurely terminate the project and use the legal mechanisms of Bankruptcy to remove all future liabilities for the Owners and Investors.

Such mechanisms are of course unavailable to the government and the public, who must absorb the lingering effects of the Project's activities after it disappears.

In the scenario examined by the Draft EIR, such an event never happens over the 80-year timeline of the analysis. But eventually the Project will shut down. There are many scenarios in which that will occur well before 80 years have passed, as the Project managers react to events and make decisions to protect business interests.

A Shutdown could happen at any time. The Draft EIR doesn't appear to have analyzed any such scenario other than the full 80-year timeline.

### 3.3. Personal Experience

Since I am now approaching my 80s, I have had time to experience some long-term Projects and their outcomes. One such project reminds me of what can happen in Mining operations.

In the 1950s, I recall as a child visiting relatives in the mining areas of central Pennsylvania. We frequently drove through a town called Centralia, PA. It was the quintessential small town in America – a main street with busy storefronts, children playing on the ball field at the edge of town, people tending their gardens in the houses on the side streets, and other such staples of small town life.

The vitality of the town came from the local mining operation. Mine tunnels perforated the ground under and around the town. Mining was a hard life but it supported the town. My grandfather told me many stories of his experiences as a supervisor in one of the mines. Overall, life was good.

In Spring 1962, the unexpected happened. There was an accidental fire, possibly started as part of a cleanup operation triggered by new government regulations. The fire progressed underground, likely through one of the many air shafts and tunnels in the area. The coal seam underground caught fire, fed by the coal as fuel and the air which could be drawn to the fire through the many fissures and cracks common underground. At least that's what some think happened; the true cause of the fire may never be known.

The mining company went out of business, unable to operate a burning mine. The local, state, and federal governments all attempted to put the fire out, at considerable public expense.

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Sixty years later, the fire is still burning. The coal deposits run for hundreds of miles. Estimates are that it might burn for 250 years. Surely that wasn't in their Plan.

The town of Centralia, sitting on top of the fire, is now abandoned, unsafe for humans. It is a surreal experience for me to drive through the town now, remembering what it used to be, and seeing instead a scene appropriate for Dante's Inferno, with jets of steam coming out of the ground where the kids used to play.

Gold doesn't burn, so it's unlikely that a similar experience would occur in Grass Valley. But my experience has been that accidents do happen, and things don't always go according to plan.

I've only lived in Grass Valley for 8 years, but I can see evidence of unplanned events in past local mining activities. For example, we have a state park where Empire Mine used to operate. I've learned that it was shut down prematurely due to war constraints and has been idle for almost 70 years.

Yet there are still today areas of the Park where the soil is too toxic to permit visitors to even walk through the area safely. The mining companies are long gone, and the government now has the continuing responsibility to monitor the area while trying to find funds to perform mediation activities. Like the mine fire I experienced, such responsibility and expense is likely to go on for many years.

### 3.4. Inadequacy of Draft EIR

The Draft EIR focuses on the "best case" scenario of a mining operation proceeding as planned for 80 years. It details numerous tasks that will be performed by both the Project staff and government overseers during the 80-year lifetime.

The Draft EIR does not appear to consider the possibility that the Project will not go as planned, and may terminate prematurely. It does not describe the environmental impact which will occur if the ongoing tasks of monitoring and mitigation are no longer being performed after the Project ceases – either after 80 years or possibly much sooner.

In my opinion, the 80-year lifetime scenario is unrealistically optimistic, and it is far more likely that something will occur much sooner that will affect the Project. Since the Draft EIR does not consider such a possibility, which seems more likely to be the actual experience that will occur, its analysis and conclusions do not reflect the reality of what Grass Valley is most likely to experience in the future, both near-term and long-term.

Reliance on any such Plan, especially one with such a long timeline, is extremely risky for the government and the people, who are not protected by the various legal structures to limit liability as the Corporate entities are.

For example, the plan describes activities such as dewatering, treatment of water before release into the environment, monitoring of wells and runoff from mine tailings, and other such measures to be taken continuously during the lifetime of the Project.

The Draft EIR fails to specify how such activities will occur if the Project terminates prematurely.

The Draft EIR is inadequate for purposes of evaluating the likely environmental impact of the Project, and should not be used as guidance for decisions until it is revised to address the most likely realities of the future, especially the time period after the Project is terminated, whether that happens in 80 years or just a few months.

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## 4. Local Conditions

The Draft EIR has not considered Local Conditions that are specific to Grass Valley, and may be important to Environment Impact.

### 4.1.1. Sound, in the Grass Valley "Auditorium"

I am not an Acoustics Scientist or expert in that field. However, I worked for 13 years at a consulting company that was renowned for its Acoustics expertise, and had done numerous projects in that area. For example, the company was responsible for the analysis of the gaps in the Watergate Tapes, for the reconstruction of the Kennedy Assassination shooting recordings, for the design of many venues such as the auditorium of the United Nations, and numerous government contracts related to sonar, submarine detection and such acoustic technologies. By being surrounded by experts for years, I absorbed some knowledge about acoustics.

The Draft EIR references that it used a "SoundPlan model" but includes no details of what the model involves, how well regarded it is in the Acoustics field, or how well it applies to the Grass Valley area. Without some reassurance by independent experts about the validity of the Sound analyses discussed in the Draft EIR, I would be reluctant to accept its conclusions.

Specifically, one of the things I learned from my exposure to Acoustics experts was the complexity involved in analyzing sound behavior in venues such as auditoriums and arenas. Sound bounces off walls, and the angles formed in corners have a significant effect. Soft materials, such as curtains and seat upholstery, are used in designs to minimize the effects of such reflections, or even to augment them to make sound from a stage reach into all areas of the venue.

Grass Valley is, as its name implies, a Valley – i.e., a low area of land surrounded by hills and mountains. In effect, the entire Valley is a large "auditorium" where sound behaves as it always does, bouncing off the "walls" of mountains and buildings, and shaped by the "soft materials" in the venue – i.e., the trees, grass, and brush.

The Draft EIR, on page 4.10-23, explains the scientific fundamentals of Sound: "As a general rule, sound from a localized source spreads out as it travels away from the source, and the sound pressure levels drop off with distance according to fundamental relationships."

My non-expert understanding of the science concurs with that statement – but only in the case where the "localized source" is in the middle of a flat plain. As you have undoubtedly noticed, Grass Valley is not a flat plain. We're not in Kansas.

The sound analyses described in section 4.10 seem to base their analysis on measurements and projects in the immediate area of the Mine Project itself, e.g., "at Nearest Residences" and "at Nearest Receptors". Even if such measurements and predictions are correct, they fail to recognize the nature of Grass Valley as an "auditorium".

In auditoriums, sound can be focussed by the various walls and anything that reflects the sound, as well as by things that absorb it. This can have an amplifying effect. In some auditorium designs, words spoken on a stage will be louder in the audience than they are to other people on the stage, because the design of the walls and baffles purposely focusses the sound into the audience.

If the Mine Project is the "stage" from which sound is emitted, it may be quite a bit louder at some distance greater than the "nearest" listeners. The hills and mountains surrounding the Project

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Comments on Draft EIR

Haverty

Site are the "walls" of our "auditorium", and will affect the propagation of sound in the Valley just as they do in a building.

Additionally, as I noted above, ongoing efforts in the community, many required now by law, will remove noticeable quantities of brush and trees. That will likely change the acoustic character of the Grass Valley "auditorium", making sound more easily propagated as such sound absorbing materials are removed. The sound analyses of the EIR should consider the future conditions of the area in order to get an accurate projection of how sounds will affect the Environment.

Because of these effects, I would expect a much more detailed and expansive acoustic analysis would be required before drawing conclusions such as are in Section 4.10 of the EIR.

**4.1.2. Non-vehicular Transportation**

Significant analysis is presented in the Draft EIR relating to Transportation, even including Bicycle and Pedestrian usage. However, the analysis seems to be limited to transportation along existing roadways. Similarly, analysis of the Environmental Impact of the Project on Views seems to focus on views experienced by the public as they travel through the area roadways.

While such analyses may be common, and appropriate, for Projects in Urban areas, the Grass Valley Area is not typical of such areas. People move to, live in, and visit Grass Valley in many cases for the wealth of outdoor activities which are available in the area.

Specifically, there are numerous hiking, equestrian, and mountain biking trails in the area, including in various Parks, NID and BLM lands, and other public areas.

The Draft EIR extensively analyzes uses of the roadways, and assesses the impact of the Project on the public using those facilities. But it seems to ignore the use of the many trails in the area for non-vehicular travel, and assess the impact of the Mine Project on the public use of those facilities, including both impacts on Views as well as effects of Sound.

Additionally, such public usage will also be affected by ongoing efforts such as brush and tree removal for fire safety. As noted earlier, such activities can be expected to change the nature of the Grass Valley, especially as Views and Sound are concerned.

Without an analyses of the Mine Project impact on the non-vehicular aspects of public use, focussed on the future rather than just the present, the EIR seems incomplete, and its conclusions about the impact of the Project are invalid.

**4.1.3. Tourism**

As noted earlier, part of the public usage in Grass Valley comes from Tourism. The Draft EIR does not seem to distinguish any different components of "the public" in drawing its conclusions about the significance of the Mine Project impact.

However, it seems reasonable to conclude that different people have different sensitivities to aspects such as Views and Sound. Residents might be here because of job opportunities or housing options. Tourists likely come for the experience of the Mountains and the natural environment.

In particular, Tourists may be less tolerant of situations where noise and views become more industrial, replacing the natural experience that attracted them with industrial noises, smells, and congestion.

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**Comments on Draft EIR**

Haverty

↑ The Draft EIR fails to distinguish any components of the public presence in Grass Valley, or differentiate the likely significance of the Project to each. For example, will Tourism fade away if Grass Valley becomes a less desirable place to visit?

Although I understand that the Draft EIR is not intended to analyze economic impacts, this aspect of the EIR failure to differentiate parts of the public should be corrected, so that suitable projections on Tourism behavior is available to the Economic Study.

**4.1.4. Inadequacy of Draft EIR**

By failing to consider local conditions specific to Grass Valley, the Draft EIR paints an incomplete picture of the effects the Mine Project is likely to have on our specific area. Its conclusions are therefore likely inaccurate, and should not be used to guide decisions.



## 5. Incomplete Analysis

The Draft EIR fails to analyze issues completely, ignoring some aspects which could alter its conclusions.

### 5.1.1. Psychoacoustics

In my exposure to Acoustics experts, I learned of the existence of a scientific field called Psychoacoustics. This is the study of how sound affects people, which is of course one of the major "Environmental Impacts" that will occur.

The Draft EIR presents much data about expected sound and noise levels, and compares the expected sound levels against various limits determined to be maximum acceptable levels. It draws conclusions such as sound levels being far below "levels at which structural damage to buildings is possible."

However, maximum sound levels are not the only criteria for evaluating the effects of sound.

Anyone who has experienced sleeplessness in the middle of the night due to a faucet dripping will understand that even seemingly innocuous sounds can have a devastating psychological impact on people. Such techniques have even been adopted as interrogation tactics, such as the "chinese water torture". No physical damage is visible, yet the mental damage can be severe.

Sounds do not have to be loud and damaging to have a serious impact on the Environment in which people live, work, and play. An unrelentless minor sound, such as a dripping faucet, can have serious impacts on people.

Sounds associated with the Project, even if seemingly benign, might have a serious effect when they are repeated, incessantly, every day, for years, and echo throughout our Valley. Rumbles of random explosions, muted roar of trucks and machinery, and other such sounds and vibrations may not be strong enough to cause damages to property, and may meet government standards intended to avoid such damage.

But they may cause serious psychological damage, and people affected might not even be aware of what's happening. Grass Valley may become a less desirable place to call home, or a less desirable place to visit as a Tourist, and no one may even be aware of the cause.

An acoustic analysis of the Mine Project, by an expert in Psychoacoustics, seems prudent before accepting the conclusions of the EIR related to the Environmental Impact of sound and vibration, and making decisions about the future.

### 5.1.2. Effects of Dewatering

The Draft EIR presents detailed plans for the dewatering process necessary to the reactivation and operation of the Mine and notes that such pumping operations will continue for many decades. It also recognizes the concerns on the impact of such dewatering on wells in the immediate vicinity, and details mitigation measures that will be taken, at the expense of the Project itself.

The studies referenced in the Draft EIR focus on the site of the Project itself, and the dewatering of the mine shafts to be used for the Mining operation over the next 80 years.

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↑ However, even from my personal experience with mining as mentioned above, I would expect that a dewatering operation would not be limited to the Idaho-Maryland site and its own mineral rights areas.

As I noticed in the Centralia Fire above, mines are interconnected, if not by purposeful shafts then likely by fissures and cracks in the hard rock throughout our area. The Centralia Fire, even after its mine shafts and tunnels became involved, was expected to go out as the fuel was consumed. But that didn't happen. The fire spread to other mines, abandoned tunnels, and expanded.

I suspect water will do the same, although it may take years. As mining occurs and blasting is used to make new tunnels and drifts, the associated seismic shocks may open new cracks and fissures, enough to permit water to flow.

Such water flow seems, to me as a non-expert, somewhat unpredictable. Will water flow from an area outside of the Project site, bringing in whatever materials might now be imprisoned there? Will water from the Project site flow out through some new path, possibly escaping all of the provisions put in place to treat it before release into the Environment?

As water flows, it can cause other problems, such as erosion. Running water can reduce mountains to become canyons. Even in Grass Valley, we have recently seen the effects of erosion due to underground water flow. The large sinkhole near the McCourtney interchange developed, as I understand it, because of unexpected water flows underground. That was apparently not a result of any mining activity or artifact, but is indicative of what can happen, and has happened, in our area when water goes where it isn't expected to go.

Huge volumes of earth have been submerged by accumulated water for many decades. Water tends to protect some materials, such as wood that may have been used as timbers for supporting tunnels and other construction in the old mines. Such conditions likely exist in not only the Idaho-Maryland mine, but also others in the adjacent areas.

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As the water is removed, such old construction will likely be exposed to air, which might cause further decay to begin again. It may take years for the effects to progress far enough for timbers to fail, potentially causing collapses in the underground areas, which may go unnoticed especially if they occur in areas not being actively worked by the Mine Project itself. The Draft EIR does not seem to consider this possibility, even within the Idaho-Maryland site itself where the report is focussed.

(In addition, as water flows and potentially dewater other areas beyond the specific Project site and immediate neighborhood, wells might fail elsewhere as well, or become contaminated and unusable as water flows change. The Draft EIR seems to lack any explanation of how such occurrences, although not planned or included in the current regulations and agreements, will be mitigated. Will they become the responsibility of the Mine Project, assuming it still exists at that time? Will it be the responsibility of some part of the Government? Will it be the responsibility of the residents who happen to own the affected wells?

**5.1.3. Inadequacy of Draft EIR**

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By failing to examine important aspects of the Mine Project, even to note that they will exist but have no significant impact, the EIR analyses are incomplete. Its conclusions, and the various mitigation, monitoring, or other such parts of the 80-year plan to manage such impacts, are also suspect, having been developed with incomplete information.

↑ Above I have presented only a few areas in which I've noticed that the EIR is incomplete, namely in its treatment of Sound, where I have some acquired experience. There are many other elements of the Draft EIR which may have similar failings, but I am not skilled enough to notice



**Comments on Draft EIR**

Haverty

them. For example, the analyses related to Toxic Materials is especially worrisome to me because of its long reaching impact and serious effects, but I have no expertise in that area.

However, the incompleteness I have noticed in the issue of Sound makes me wary of the analyses and conclusions in other areas as well.





## **INDIVIDUAL LETTER 382: JOHN HAVERTY**

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### **Response to Comment Ind 382-1**

This is an introductory comment and does not provide a comment on an environmental issue associated with the project. Please see Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 382-2**

The commenter states that the environmental baseline for the project incorrectly relies on existing conditions. However, as stated in CEQA Guidelines Section 15125(a)(1), the environmental analysis presented in the DEIR should typically compare the project to the physical environmental conditions as they exist at the time of the Notice of Preparation. Moreover, the DEIR analyzes fluctuations in conditions that may occur over time such as large storm events, multiple dry year scenarios, and effects from reasonably foreseeable future development. As such, the DEIR sets the proper environmental baseline as required under the CEQA Guidelines, but also considers fluctuations in the environment that may occur over the life of the project, when appropriate.

### **Response to Comment Ind 382-3**

Chapter 6 of the DEIR considered project alternatives. As summarized in DEIR section 6.2, and provided in CEQA Guidelines Section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternative analysis in section 6.2 of the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis given that they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail. (see DEIR section 6.3.)

### **Response to Comment Ind 382-4**

The comment states that the DEIR is generic in its analysis and presentation of the existing environment. However, the commenter does not identify any specific inadequacies in the DEIR's analysis. This comment is general in nature and does not provide a comment on a specific environmental issue associated with the project.

### **Response to Comment Ind 382-5**

The comment generally states that some technical aspects were not addressed in the DEIR. However, the commenter does not identify any specific inadequacies in the DEIR's analysis. This comment is general in nature and does not provide a comment on a specific environmental issue associated with the project.

### **Response to Comment Ind 382-6**

The commenter asserts that the DEIR is inadequate in comparing the Grass Valley environment with the project, but does not provide any specific references or examples. This comment is general in nature and does not provide a comment on a specific environmental issue associated with the project. Please see Master Response 1 - Non-EIR/ Administrative Issues regarding approval/denial of the project.

### **Response to Comment Ind 382-7**

Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA. The DEIR analyzes most impacts on the Centennial Site based on the reasonable environmental conditions that are expected when the site is cleaned up under a separate DTSC clean up project. If that separate project does not proceed, the Idaho-Maryland Mine Project would proceed, but would not place any material on the Centennial Site and would not impact the Centennial Site in any





way. Therefore, it would be misleading to analyze most project impacts based on the existing conditions on the Centennial Site, as the project could not impact the Centennial site under existing conditions.

### **Response to Comment Ind 382-8**

The commenter asserts that the DEIR should analyze the project's impact on the environment as the environment changes over time. Please see Response to Comment Ind 382-2 above.

CEQA Guidelines Section 15130 requires an EIR discuss cumulative impacts of a proposed project. Cumulative impacts are considered impacts created because of the combination of the proposed project with reasonably foreseeable future projects. DEIR section 5.3 summarizes the cumulative impacts analysis, and each resource analysis includes an analysis of cumulative impacts specific to that resource. The DEIR analyzes the project in the context of reasonably foreseeable projects, but the DEIR does not include analysis of future changes in the region that are unknown and/or speculative. As stated in CEQA Guidelines Section 15384, “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.”

### **Response to Comment Ind 382-9**

The commenter asserts that the project should be evaluated in the context of the changing environment in Grass Valley. Please see Responses to Comments Ind 382-2 and Ind 382-8. Impacts to the City of Grass Valley were analyzed when appropriate based on the resource section. For example, traffic analysis included the analysis of intersections and road segments within the City. In addition, the aesthetics analysis included viewpoint locations within the City boundary.

### **Response to Comment Ind 382-10**

The commenter asserts that the project should be evaluated in the context of the changing environment and points to project impacts in the context of future traffic conditions. Please see Responses to Comments Ind 382-2 and Ind 382-8. The commenter is incorrect in its assertion that only existing conditions were analyzed for the purpose of assessing traffic impacts, as the DEIR analyzed future scenarios based on reasonably foreseeable traffic conditions.

DEIR Chapter 4.12, and the supporting traffic study (see Appendix O), analyzed twenty-four intersections and six roadway segments. As described and analyzed in DEIR section 4.12.4, based on consultation with Nevada County and the City of Grass Valley, seven different scenarios were analyzed including:

- Existing Condition: LOS based on current traffic counts, existing roadway geometry, and existing traffic control.
- Existing Plus Approved Projects (EPAP) Condition: LOS based on the Existing Condition plus traffic and improvements from projects that are approved or are reasonably foreseeable in the next five years.
- EPAP Plus Project Condition – Scenario #1: LOS based on the EPAP Condition plus traffic from the proposed project, considering transport of engineered fill to the Centennial Industrial Site.
- EPAP Plus Project Condition – Scenario #2: LOS based on the EPAP Condition plus traffic from the proposed project, considering transport of engineered fill to construction sites accessible via SR 49.



- Cumulative No Project Condition: LOS based on traffic volumes associated with cumulative buildout of the Nevada County region projected to occur by 2035 without traffic generated by the proposed project. The Cumulative No Project Condition includes reasonably certain projected changes to intersection geometry and roadway segments.
- Cumulative Plus Project Condition – Scenario #1: LOS based on the Cumulative No Project Condition plus traffic from the proposed project, considering transport of engineered fill to the Centennial Industrial Site.
- Cumulative Plus Project Condition – Scenario #2: LOS based on the Cumulative No Project Condition plus traffic from the proposed project, considering transport of engineered fill to construction sites accessible via SR 49.

This was a comprehensive analysis of potential project impacts to intersections and roadway segments consistent with the requirements of CEQA, and based on reasonably foreseeable traffic conditions in 2035.

### **Response to Comment Ind 382-11**

The commenter asserts that the project should be evaluated in the context of the changing environment with respect to aesthetics and noise impacts. Please see Responses to Comments Ind 382-2 and Ind 382-8.

DEIR Chapter 4.1 and Chapter 4.10 analyze proposed project impacts to aesthetics and noise and vibration, respectively. Each section includes an analysis of potential cumulative impacts. The aesthetics section (Chapter 4.1 of the DEIR) determined this impact was cumulatively considerable and significant and unavoidable given the anticipated cumulative build-out in the area changing the visual character of the region. The noise and vibration analysis determined the cumulative impacts were less than cumulatively considerable. (see Impact 4.10-6 of the DEIR.) Notwithstanding, the project-specific operational noise impact was conservatively determined to be less than significant after mitigation. Mitigation Measure 4.10-3 requires a comprehensive noise monitoring program to be conducted of each facet of the operation to verify the modelling assumptions of the project and to ensure that compliance with the applicable Nevada County noise standards is being achieved at nearby sensitive receptors. If results indicate that noise standards are being exceeded, operations shall cease until additional engineering controls can be implemented as needed.

The commenter's environmental scenario that "may" exist in the future is not known with any reasonable certainty such that it could be analyzed without engaging in speculation. It is not clear what factors the commenter wishes to have considered, beyond changes in traffic patterns, which is already accounted for in the DEIR (cf. Response to Comment Ind 382-10), and modification of vegetation due to future fuel treatment efforts, which are not clearly defined. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation about future unknown environmental changes in the region, no further response is necessary.



### **Response to Comment Ind 382-12**

Comment noted. This comment is general in nature and does not provide a comment on a specific environmental issue associated with the project. Please see Master Response 1, Non-EIR/Administrative Issues.

### **Response to Comment Ind 382-13**

The commenter asserts that the DEIR did not properly analyze unknown future conditions such as accidents, surprises and changed conditions. CEQA does not require that an EIR analyze impacts based on speculation. (CEQA Guidelines Section 15384.) However, the DEIR incorporates numerous mitigation measures and conditions of approval that provide the County with authority to enforce the requirements of those mitigation measures and conditions of approval to ensure that the project does not cause impacts beyond those analyzed in the DEIR. Moreover, some of the mitigation measures require that the applicant obtain other governmental approvals that will also allow state agencies to have oversight and enforcement authority over project operations to ensure that the project's operations are consistent with applicable law, and the impacts are consistent with the DEIR's analysis. The DEIR analyzes the environmental impacts of the project as proposed and does not attempt, nor is required to analyze under CEQA, the financial viability of a project or the likelihood it will encounter obstacles that may affect its viability. The commenter does not identify a specific impact created by the project or any inadequacy with the analysis presented in the DEIR.

### **Response to Comment Ind 382-14**

The commenter explains the facts surrounding a coal mine disaster in Pennsylvania and draws a comparison to the project. The project does not propose to mine coal, so the projects are distinguishable. Please see Response to Comment Ind 382-13.

### **Response to Comment Ind 382-15**

The commenter states that the DEIR is inadequate because it does not analyze what would happen if the mine closed prematurely. Please see Response to Comment Ind 382-13 above. In addition to governmental oversight provided by the mitigation measures, conditions of approval, and generally by local, state and federal law, the project is required to obtain approval of a reclamation plan and financial assurances. As such, financial assurance will be provided by the mine operator to the County prior to operating the mine, as required under the California Surface Mining and Reclamation Act. (see DEIR p. 3-47.) Financial assurances may also be required by other governmental agencies with oversight over the project such as the Regional Water Quality Control Board in connection with issuance of waste discharge requirements.

### **Response to Comment Ind 382-16**

Commenter alleges that the DEIR did not consider local conditions and is not aware of the SoundPlan Model or its accuracy, and that Grass Valley is an auditorium. The SoundPlan Model, which has been used worldwide for 30 years, is internationally recognized by the acoustical consulting profession as being a state-of-the-art noise prediction model. The latest guidelines and noise standards are constantly being incorporated into the software updates, and SoundPlan staff participate on advisory boards to acoustics standards committees. The sound prediction algorithms have been verified with field measurements numerous times.

The commenter is correct that sound reflections and propagation in auditoriums and arenas can differ from general outdoor sound propagation and that soft materials do absorb, rather than reflect, acoustic signals. However, the commenter is incorrect that the area surrounding the project site behaves like an auditorium, with sound focused in some areas. For sound focusing to occur, sound reflections are required. The area surrounding the project site consists of vegetated



ground cover with extensive pine tree cover. Such materials are acoustically absorptive rather than reflective. Furthermore, the noise contours contained in the DEIR clearly illustrate the extent by which the sound will "travel" from the project site. The SoundPlan model, which was used to generate the project noise contours, accounted for the fact that the project site will consist of harder surfaces with no tree cover, whereas the area immediately surrounding the project site will remain densely vegetated. (DEIR p. 4.10-24.) As a result, the predicted noise levels at both nearby and distant residences reflect the changes in ground cover which will result from the project, as well as the topography of the area surrounding the project area. The detailed and expansive acoustical analysis expected by the commenter for this project was, in fact, completed with the results of that analysis clearly presented in the project DEIR.

### **Response to Comment Ind 382-17**

The comment infers that use of parks, public lands, hiking, equestrian and mountain biking trails in the area may be impacted by noise, and users will see impacts on the views from these publicly available facilities. The commenter does not identify any trails, public facilities or lands or parks located in the vicinity of the project site, or any that may be impacted by the project. The nearest trail to the project area is the Loma Rica Trail, running north-south along Brunswick Road, from Loma Rica Drive north to Bubbling Wells Road; additionally, the edge of Empire Mine SHP is approximately 850 feet from the boundary of the Brunswick Site. (DEIR p. 4.11-8.) However, the distance from that nearest trail to the proposed project's noise-generating operations within the Brunswick Site is over 2,500 feet. The nearest trail within the Empire Mine SHP is nearly half a mile, or approximately 2,250 feet, from the nearest proposed noise-generating activities within the Centennial Site. The DEIR analyzed other sensitive receptors located much closer to the noise-generating aspects of the proposed project, which were determined to be less than significantly impacted by project noise generation, and more distant receptors, including the Empire Mine SHP trail network, or the Loma Rica Trail would similarly be less than significantly impacted by project noise generation. The Loma Rica Trail runs near the County airport and would be much more impacted by the noise from air traffic and the nearby industrial park than the project. DEIR Figures 4.10-7 and 4.10-8 show that both daytime and nighttime noise generation of operations at the Brunswick Site would be well below 40 dBA at the Empire Mine site. DEIR Table 4.10-4 (General Plan Noise Element Exterior Noise Limits) shows that the County's noise standard applicable to recreation use is 70 dBA Leq during the hours in which the park would be open to the public (i.e., 7 am - 7 pm). As such, the project noise level of less than 40 dBA at the park site from Brunswick operations would be more than 30 dBA **below** the County's noise standard applicable to recreation uses. At the portions of the Empire Mine SHP nearest to the Centennial Site, predicted daytime noise levels are 27 dBA at the grasslands and 22 dBA at the nearest trail within the park. (DEIR Figures 4.10-7 and 4.10-8.) The noise levels at both locations are well below the County's 70 dBA daytime noise level standard. As a result, the Empire Mine SHP and the Loma Rica Trail, which are the only public recreational facilities somewhat near the project site, would not be adversely impacted by noise from operations at the Centennial Site.

Regarding impacts on the viewshed, the commenter infers that undue attention was given to views of the project site from public roadways at the expense of parks, trails and public lands. The project site is surrounded by undeveloped forested land, industrial, rural residential development, and commercial uses. (DEIR p. 4.1-1; see also Table 3-2.) As part of the Aesthetics Technical Study, public viewer groups and vantage points from the surrounding area were considered to assess how the public would perceive changes in site conditions associated with the proposed project. The vantage points include public views considered to be the most visually sensitive locations. The commenter does not name any park, trail or public land that has a view of the project site, because none of the parks or trails in the general vicinity of the project have



line-of-sight to either the project site or any anticipated project operations, and the views from any of the listed facilities would not be impacted by the project. (DEIR p. 4.11-8)

### **Response to Comment Ind 382-18**

Please see Master Response 1 - Non-EIR/Administrative issues, and Master Response 2 - Social and Economic Impacts.

Regarding noise, DEIR Chapter 4.10 analyzed the proposed project's potential impact on noise impacts to existing sensitive receptors in the area of the project and haul route. The determination of a noise impact is not dependent on the type of person who may hear a sound (e.g., resident vs tourist) but rather if proposed project noise levels either exceed County standards or significantly increase the ambient noise condition. This proposed project's impact on noise was analyzed in DEIR Chapter 4.10, which found that temporary construction noise would be significant and unavoidable, but that other noise impacts from the project were less than significant after implementation of mitigation.

### **Response to Comment Ind 382-19**

The commenter believes the DEIR should include an analysis of psychological damage to the population who may be exposed to project sound even if noise thresholds are not exceeded. The standards of significance utilized for this DEIR were not arbitrarily selected so as to ignore the psychological effects of noise or to be favorable to the Project Applicant. Rather, the County's adopted noise standards, the CEQA Guidelines and Appendix G criteria, as well as the vibration criteria utilized in the project DEIR, were developed to specifically protect residents and other sensitive receptors from the harmful and annoying effects of noise and vibration, and they are consistent with standards recommended by the state of California for the development of community noise control ordinances. Although the noise evaluation did present information pertaining to the maximum noise generation of the project, as required by County policy, it also evaluated the effects of the project in terms of the County's average hourly noise level criteria and additionally evaluated potential impacts relative to baseline ambient noise conditions, per CEQA requirements. As noted in responses to other noise-related comments, the applicant will be required to conduct extensive noise monitoring following commencement of operations to ensure that the appropriate noise criteria are being satisfied during daytime, evening and nighttime hours. (DEIR p. 4.10-50.)

### **Response to Comment Ind 382-20**

The commenter asserts that water from areas outside of the mineral rights area may be drained of groundwater as a result of the project, that the water from other nearby mines may flow into the project mine works, and that the water may flow through some new path into the environment without proper treatment. The historical Empire mines and other mines are separated from the Idaho-Maryland mine by low permeability rock without any direct hydraulic connections and there is no direct flow from these historical mines to the future Idaho-Maryland mine workings. Please see Itasca Clarification Memo attached to the Final EIR as Appendix O.

In reference to rock fracturing, mining uses explosives to break rock into smaller pieces so it can be moved. The small amounts of explosives used in mining do not open cracks and fissures beyond the immediate vicinity of the blast itself and would not open cracks outward or toward other mines, allowing water to flow from outside areas into the mine. As discussed in Section 4.2 of Appendix M, the breaking of rock includes drilling a number of parallel holes in the mine face. Generally, one or more of these drillholes are located near the center of the drill pattern and used as void or "relief" holes (open holes not loaded with explosives). The holes drilled around that hole are then loaded with explosives and are set off. That first hole "relieves" the blast, and allows





the least amount of explosives possible to break the first rock out of the mine face. The remaining holes located around the first blast are then initiated using a series of delays to progressively enlarge the blasted area until the final dimensions and profile of the drift are created. Any fracturing of rock outside of the blasted excavation is limited to a very few inches beyond of the drill hole and therefore the process cannot create the extensive cracks or fissures envisioned by the commenter.

The DEIR analyzed potential groundwater drawdown in Chapter 4.8, and concluded that impacts to water supply would be less than significant after mitigation. Please see Master Response 14 - Adequacy of Groundwater Model.

### **Response to Comment Ind 382-21**

The commenter asserts that mine timbers in the existing underground mine may fail and collapse after the mine is dewatered and that erosion may result from the project. Additionally, the commenter asserts that water wells outside the expected impact area may fail causing uncertain liability for water replacement. Certain areas of the mine (primarily in the Idaho mine workings) used timber historically for ground support in tunnels. These workings may be already caved or may remain open. As the commenter notes, the flooded state of the mine, and resulting low oxygen, prevents the timber from rotting and the dewatering of the mine could cause these timbers to degrade and possibly lead to a certain tunnel collapsing. However, even if such an event occurred, the tunnels are too deep to cause subsidence at surface. Please see Master Response 29 – Near surface Workings.

Water flow, erosion, water quality, and well dewatering is extensively discussed in the DEIR and includes discussion on regulatory requirements and mitigation measures. Please see Chapter 4.8 of the DEIR.

The DEIR analyzed potential groundwater drawdown in Chapter 4.8, and concluded that impacts to water supply would be less than significant after mitigation. Please see Master Response 14 - Adequacy of Groundwater Model. The DEIR's conclusions regarding water supply and drawdown were peer-reviewed by the County's independent expert, West Yost, who concurred with the DEIR's conclusions. Mitigation Measure 4.8-2(a) requires a groundwater monitoring plan that includes installation and monitoring of numerous groundwater monitoring wells to detect drawdown impacts before they become significant enough to affect well owners. Additionally, Mitigation Measure 4.8-2(b) requires the applicant to be responsible for replacing water for any impacted wells beyond the expected drawdown impact area. Moreover, Mitigation Measure 4.8-2(c) requires the applicant to construct and pay for the connection of 30 parcels to potable water supply, including payment for water charges during the life of the project or until the parcel is sold or annexed into the City of Grass Valley. As such, the DEIR provided mitigation sufficient to mitigate the project's water supply impacts, even if the drawdown area is greater than expected.

### **Response to Comment Ind 382-22**

The commenter summarizes its comments as set forth in the comment letter. Please see Responses to Comments Ind 382-1 through Ind 382-21. The commenter's generally noted concern related to toxic materials is too general to warrant a specific response – Please see Master Response 1.



**Individual Letter 383**

John Hellwig  
311 Park Avenue  
Nevada City, CA 95959  
530-205-6670

April 2, 2022

Matt Kelley, Senior Planner  
County of Nevada  
950 Maidu Avenue  
Nevada City, CA 95959

Re: Draft EIR of Idaho-Maryland Mine Project

Dear Mr. Kelley:

I am a long-term resident of Nevada County. My family moved here in 1970 when I was a teen, and I have spent the majority of the intervening 52 years here in the Grass Valley / Nevada City area. Over the last 20 years, I raised my family here.

Professionally, I have had a 40+ year career in technology research and development, having held senior technical and management positions in several technology companies. I have a Bachelor's degree in Mechanical Engineering from UC Davis and a Masters in Business Administration from UC Berkeley.

I am writing to you today to voice my deep concern about the highly inadequate Draft EIR that has been submitted in support of the proposed Idaho-Maryland Mine Project. The analysis is flawed in several ways, a few of which I briefly summarize below.

Hazardous Materials -- the DEIR essentially ignores the disposition of existing waste rock and tailings at the Centennial site, known to be contaminated (through mining operations) with lead, arsenic, nickel and mercury at concentrations above California hazardous waste levels. The DEIR assumes these wastes to be magically cleaned up. Further, the analysis fails to describe how future waste rock and mine tailings will be managed to prevent toxic hazards to people and the environment.

It is widely understood that historical mining in the Sierra foothills left a devastating legacy of toxic waste in the environment -- which is the reason that the Centennial site sits contaminated today. Do we really want to surface untold additional tons of toxic mine rock and tailings for the next 80 years?

**Ind 383-1**

**Ind 383-2**



Ind 383-3

Groundwater and Domestic Wells – The proposed project would lower groundwater levels in the mine by over 3000 feet, essentially acting as an enormous extraction well for the next 80 years. This will likely have a profound impact on hundreds of households and businesses relying exclusively on groundwater, and in turn, on their livelihoods and property values. Yet, the DEIR concludes, based on inadequate groundwater data, unreliable mathematical models of non-homogenous bedrock fractures, and insufficient monitoring wells, that impacts to wells will be insignificant, other than to a small number of wells in the East Bennett area. The DEIR does not adequately support this conclusion.

Many people in Nevada County are already having serious (and expensive) problems with diminishing production in wells associated with extended drought. Do we really want to drain the remaining groundwater in a large part of the Grass Valley area?

Ind 383-4

Air Quality – According to the DEIR, unmitigated emissions of NOx, reactive organic gases and respirable particulate matter would exceed certain air quality thresholds established by the Northern Sierra Air Quality Management District, during construction and the 80-year life of the project. This constitutes a potentially significant air quality impact that should be mitigated. However, there is no evidence in the DEIR that such impacts will be mitigated to a level less than significant. Additionally, the DEIR lacks substantial evidence to support its conclusions pertaining to health risks associated with toxic air contaminants such as asbestos, silica and heavy metals.

Our air quality here in western Nevada County is already very poor – and getting worse with the increasing numbers of fires due to climate change. Do we really want to add another generator of bad air in the immediate vicinity of Grass Valley for the next 80 years?

Ind 383-5

This mine proposal and its associated DEIR have very real deficiencies that portend material, negative impacts on thousands of local residents. The DEIR must be rejected in its current form.

Thank you for your consideration.

Sincerely,

John Hellwig



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## **INDIVIDUAL LETTER 383: JOHN HELLWIG**

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### **Response to Comment Ind 383-1**

This comment is introductory in nature and the commenter states generally that the DEIR is inadequate. Responses to specific comments are provided below.

### **Response to Comment Ind 383-2**

The commenter states that the DEIR fails to discuss the existing contaminated materials at the Centennial Industrial Site and how the site will be remediated. The commenter also states that the DEIR fails to mention how future waste rock (engineered fill) will be managed to prevent toxic hazards. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.

### **Response to Comment Ind 383-3**

The commenter states that the DEIR understates the impacts associated with the dewatering of the mine but does not specify how the DEIR is inadequate. The commenter is referred to Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

### **Response to Comment Ind 383-4**

The commenter states that certain unmitigated emissions would exceed NSAQMD's criteria. However, according to the NSAQMD, the DEIR's implementation of Mitigation Measures 4.3-1(a) and (b) would reduce these impacts to less than significant. (DEIR, p. 4.3-73.) The commenter also states the DEIR lacks substantial evidence regarding health risks associated with toxic air contaminants but does not state why. Health risk impacts of the project have been analyzed in the DEIR and are less than significant after mitigation. Please see Chapter 4.3 of the DEIR and Master Response 18 - Air Quality Thresholds, Master Response 19 - NSAQMD Criteria Pollution Thresholds during Operations, Master Response 20 - Conservatism of Metals Assumptions, Master Response 21 - Conservatism of Silica Assumptions, and Master Response 22 - Conservatism of Asbestos Assumptions.

### **Response to Comment Ind 383-5**

The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.





**Individual Letter 384**

To Matt Kelley, Senior Planner

# NO to the Idaho-Maryland Mine Project

Public Comment from residents at 12223 Gayle Ln, Nevada City  
02/11/2022

## Reasons for our objection

**Ind 384-1**

I, John O'Shea, have a business in the Nevada County airport which is in close proximity to the proposed mine; my family also lives on lower Banner Mountain. I have noticed in the last couple of years that the traffic on Brunswick Rd has gotten hectic, especially in the morning and from 3pm and afterwards. I don't see how this mine is going to benefit the traffic in the area when there is going to be an additional 300+ vehicles/trucks in the area.

**Ind 384-2**

"Mining by it's nature consumes, diverts, and can seriously pollute water resources." In a state where water is already a scarce resource because of the endless drought that is seemingly only going to get worse, we can not afford to gamble on our already strained water resources just to line the pockets of a handful of people that don't even live in this county.

**Ind 384-3**

Have we not learned anything from history? The destruction is evident around the Sierra Nevada mountain range from the various types of mining that have been done over the years. Land scars where vegetation struggles to grow, heavy metal contamination and leaching continue to affect the health of local populations of people and animals. It is absolutely crazy that anyone is willing to disturb and destroy an immense amount of land to hope to find a tiny amount of gold.

**Ind 384-4**

The men and women who will be working in this proposed mine will be subject to intense health problems directly caused by the hazardous conditions and chemicals/materials that are a standard part of mining in general. Mining accidents and deaths in the last few years have been all over the news, in worldwide locations and seem to be more common than mine owners want the public to know about.





**Ind 384-5**

The environmental impact of re-opening this mine will be lasting on Nevada County long after the mining has stopped. The heavy machinery emissions alone should be cause for concern. Climate change and the wildfires have affected Nevada Counties air quality already, and having the mine reopen will make our air quality, water quality, and the overall quality of life for residents here impacted negatively for possibly the rest of our lives.

**Ind 384-6**

I want to reiterate the point that the proposed re-opening of this mine, and all of the disruption and processes that come with it, will only be serving to enrich a small amount of individuals; while sacrificing the quality of lives for tens-of thousands of Nevada County residents for years to come, something we have seen historically from other rural places where mining was prevalent; time and time again.

**Ind 384-7**

On top of this, if the mine is re-opened and they go down and find an insignificant amount of gold to keep operations going, it is my understanding that the county will ultimately have to clean up the mess that is left behind after the company has declared bankruptcy.

Please vote no on reopening the Idaho-Maryland Mine project.



## **INDIVIDUAL LETTER 384: JOHN AND MELODY O'SHEA**

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### **Response to Comment Ind 384-1**

Traffic is analyzed in Impacts 4.12-1, 4.12-2, and 4.12-3, which start on pages 4.12-56, 4.12-67, 4.12-69, respectively, of the DEIR. The commenter expresses general concerns regarding traffic but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 384-2**

Please see Master Responses 2 and 13 through 16. The commenter expresses general concerns regarding water supply but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 384-3**

Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 384-4**

Please see Master Responses 18 through 23. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 384-5**

Please see Master Responses 1, 6, and 16, as well as 18 through 23. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 384-6**

Please see Master Responses 1 and 2.

### **Response to Comment Ind 384-7**

Please see Master Response 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 385**

**From:** [John Palmer](#)  
**To:** [Idaho MMEIB](#)  
**Subject:** No mine!  
**Date:** Thursday, March 10, 2022 10:32:54 AM

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

**Do not click links or open attachments unless** you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

**Ind 385-1**

*Imagine you're on the Nevada County Board of Supervisors and you vote to allow Rise-Gold to reopen the Idaho-Maryland Mine. Years pass. You're an old man in a nursing home now. A pall of dust and smoke hangs over the area from the ongoing mining operation. The constant thumping of the rock crusher can be heard and felt twenty-four hours a day. Wolf Creek is essentially dead from the effects of millions of gallons of toxic mine water. Wells in the area have gone dry. Roads are pot-holed and congested from all the mine trucks and equipment. Brunswick Basin is a ghost town. Mill Street is deserted. Residents have either fled the area or are hunkered down to avoid the disaster the mine has wrought. Your granddaughter comes to visit you; she's in high school now. She says, "Grandpa, we learned about the reopening of the Idaho-Maryland Mine in history class today. We learned that you voted in favor. Grandpa, why were you so stupid?"*

Sent from my iPhone



## **INDIVIDUAL LETTER 385: JOHN PALMER**

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### **Response to Comment Ind 385-1**

Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 386**

**From:** john purchase <otterpurchase@gmail.com>  
**Sent:** Tuesday, March 29, 2022 2:29 PM  
**To:** Matt Kelley  
**Subject:** IMM DEIR feedback

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**Ind 386-1**

Matt,  
My particular interest is the issue of air quality and noise at the centennial site. The thought of 1000 tons/day of toxic dust laden tailings being hauled down winding bennett road and then dumped at centennial site is appalling. I am a recent survivor of a deadly form of sinus cancer. No doubt the cause was due to inhaling toxic dust decades ago. Luckily I had good health insurance to foot the \$500k in medical expenses at stanford. The grading and compacting of this hill of tailings over a 5 year period will generate massive noise and toxic dust laden air in an increasingly dense residential area bordering grass valley city limits. Decades from now the legacy will be only sickness and death. It appears to me that the centennial site is an optional element of the project. If the mine tailings can be confined to the brunswick site it will have a less severe impact on neighborhood air quality and noise levels. Can you please be more explicit on this point in DEIR.

Sincerely,  
John Purchase  
10412 mercury drive  
Grass Valley, Ca. 95945  
831-345-7620





## **INDIVIDUAL LETTER 386: JOHN PURCHASE**

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### **Response to Comment Ind 386-1**

Please see Master Response 1 – Non-EIR/Administrative Issues and 18 through 23 regarding air quality, as well as the discussions and analyses in Chapter 4.10, Noise and Vibration, of the DEIR.

In addition, please see the analysis under Impact 4.3-2, which evaluates potential impacts related to exposure of sensitive receptors to substantial pollutant concentrations, starts on page 4.3-78 of the DEIR, and includes a health risk assessment, the results of which are summarized in Table 4.3-21 on page 4.3-80 of the DEIR. Because the potential impact is concluded to be significant without mitigation, the DEIR sets forth Mitigation Measure 4.3-2 to ensure project consistency with the CARB Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying and Surface Mining Operations by requiring preparation and implementation of an Asbestos Dust Mitigation Plan (ADMP).

Alternatives to the proposed project are addressed in Chapter 6, Alternatives Analysis of the DEIR. Alternative 2 eliminates the Centennial Industrial Site and expands the Brunswick Fill Site. Discussion of this Alternative begins on page 6-21 of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**From:** [John Reeder](#)  
**To:** [bdofsupervisors](#)  
**Subject:** opposition to proposed mine  
**Date:** Sunday, February 13, 2022 11:20:33 AM

**Individual Letter 387**

**Dist 1**

**CAUTION:** This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

- Ind 387-1** Supervisors,  
I reside in Nevada County district 1, and I am a retired physician who practiced Pediatrics in town from 1980 through 2016. I am writing to express my strong opposition to the proposed mine project.
- Ind 387-2** In particular, living near the mine site and depending on a well, I worry about the unknowable negative impacts on local hydrology. But beyond that, the glaring negative impacts on traffic, noise, and local aesthetics would be completely unjustified by any imagined advantage to our neighborhood or the county at large.
- Ind 387-3** The environmental qualities and advantages that draw us to Nevada County should not be placed at risk without a clear and strong justification. I see no reason why any citizen or supervisor would consider this major mining project attractive enough to jeopardize those qualities and advantages. In short, the purpose of the mine seems to be solely corporate profit and greed.  
Among all the things this county needs now, and the world at large needs now, more gold is certainly not high on the list of priorities.  
John Reeder MD  
12677 Jack Pine Rd  
Grass Valley



## **INDIVIDUAL LETTER 387: JOHN REEDER**

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### **Response to Comment Ind 387-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 387-2**

Please see Master Response 1. The commenter expresses general concerns regarding impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 387-3**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 388**

Nevada County Planning Commission  
950 Maidu Avenue, Suite 170  
Nevada City, CA, 95959

Date: 02/28/2022

**Ind 388-1**

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno:

My name is John Vaughan. I have been a resident of Nevada County since 1967 (55 years). My wife Gail and I live on Lower Colfax Road, approximately 100 yards from the southwest edge of the Rise Gold mineral rights area. Our property is served by a well. We are District III voters.

We do not support the Rise Gold project due to the huge negative impacts on our people, water supplies and property values and urge you to vote NO on the project.

**Ind 388-2**

I'd like to highlight one of my many areas of concern with the Draft Environmental Impact Report (DEIR), specifically the lack of inclusion and detailed review of the Nevada County Business and Industrial Center<sup>[1]</sup> (NCBIC) alternative, which with existing M1-SP zoning could include a 54,000 ft<sup>2</sup> Business Park, 242,000 ft<sup>2</sup> for Service Business/Light Manufacturing and 238,000 ft<sup>2</sup> for Industrial uses<sup>[2]</sup>.

**Ind 388-3**

I am currently retired but the last 20 years of my career were spent at PRIDE Industries in Roseville. The last 10 of those I was the Senior Vice President of Manufacturing and Logistics, including responsibility for a large distribution contract for Hewlett Packard. We operated a shipping/receiving/distribution warehouse shipping millions of printer parts/year all over the world. Our facility was just over 200,000 square feet with 12 loading docks about 10 minutes from Interstate 80. The in/out diesel truck traffic was 10-15 trucks/day between 6am-6pm. In short, I know a bit about distribution and logistics.

**Ind 388-4**

The DEIR Chapter 6 "Alternatives Considered but Dismissed from Further Analysis"<sup>[3]</sup> is incorrect and incomplete. Specifically, in the "No Project" section, the analysis of the currently permitted NCBIC alternative<sup>[4]</sup> contains incomplete information and notes examples of negative impacts that are extremely unlikely to occur in the real world. The DEIR concludes an overall negative impact of these uses and rejects this alternative without adequate review.

**Ind 388-5**

In the summary section for the NCBIC alternative<sup>[5]</sup>, the DEIR rejects this option assuming noise, traffic, aesthetics and air quality would be the same or worse for the NCBIC alternative vs. the Rise Gold mine. In virtually all cases for the types of businesses, using existing zoning, that would actually locate there, the traffic and noise would be daytime, mostly weekdays, not 24x7, comprised largely of passenger cars and small trucks with large truck traffic substantially less than the 236 trips/day for the Rise Gold project<sup>[6]</sup> and almost none of the traffic hauling toxic waste.

**Ind 388-6**

The DEIR identifies (among others) Distribution Facilities and Auto Dismantling Yards as examples of business that would "...cause substantial noise, traffic, aesthetic and air quality impacts..." While these business types are permitted under existing zoning, the likelihood of such ventures at this location is

[1] DEIR page 6-11, Nevada County Ordinance 1853, February 1994

[2] DEIR page 6-11/12

[3] DEIR page 6-8

[4] Beginning at the bottom of Page 6-11

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[6] 118 round trips, see Table 4.12-8, page 4.12-34





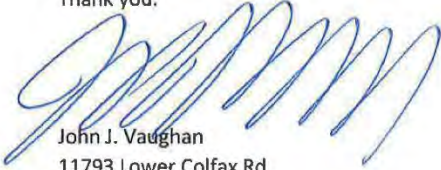
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- extremely low. Both Distribution Facilities and Auto Dismantling Yards (and Saw Mills and Planing Mills) require easy access to major freeways like Interstate 80 and therefore are not realistic for this site. In the case of large 24x7 Distribution Facilities, anything further than 10-15 minutes from a major freeway is not feasible and 238,000 square feet (238K) is too small.<sup>[7]</sup> Even if you attracted a Distribution Facility tenant, 238K would not support enough loading docks to create the same large truck traffic as the Rise Gold Mine project. Additionally, for Distribution Facilities and other permitted businesses, at the scale available at this site, the semi-truck traffic would be limited to weekday or daytime use as small to mid-size facilities are unlikely to operate 24x7. The DEIR also notes that a Milling and Planing Facility “would potentially create noise similar or greater to the proposed project.” Frankly, that’s hard to believe as there was a saw mill and planing mill at that site for decades.<sup>[8]</sup>
- Ind 388-7** Re air quality: The impact on air quality would be greatly reduced with tenants that reflect what would happen in the real world at the NCBIC vs. the unrealistic scenarios in the DEIR.
- Ind 388-8** Re traffic: The DEIR suggests that car and truck traffic to/from the NCBIC would generate the same pollution as the projected traffic to/from the proposed mine, which includes 236 semi-truck trips/day. Each diesel semi-truck emits as much pollution as 150 cars<sup>[9]</sup>. Considering only the diesel semi-trucks, producing the same emissions as 236 trips/day requires 35,400 trips/day from cars and light trucks, an unlikely scenario for the mix of businesses that might actually occupy the NCBIC.
- Ind 388-9** Re aesthetics: Given the site is already zoned for the buildings and businesses noted, aesthetic issues could be easily mitigated and included in a proposal for development of all or part of the NCBIC.
- Ind 388-10** Virtually all of the businesses listed in “Examples of Permitted Uses”<sup>[10]</sup> already exist or have existed in Nevada County without hundreds of local residents protesting about potential traffic, noise, water consumption, water usage or pollution. It seems like a reasonable model to follow to do more of what we already know how to do without changing the nature of our community for the next 80 years. I believe many of the people who oppose this mine would likely support a “No Project” alternative with the NCBIC as the best outcome.
- Ind 388-11** Assigning a “not feasible” label to the NCBIC alternative using unrealistic assumptions makes it appear as if the DEIR authors have not done their homework. I’m not saying that the NCBIC should be built now (or ever), that’s not my decision, but to reject this alternative without a more detailed review using real world scenarios and real world outcomes makes no sense.
- Ind 388-12** Rise Golds advertising “postcard” claims the “Science is Clear”. That’s debatable given that much of their science is based on assumptions and forecasts. The same postcard claims are there are “no significant impacts” while the DEIR clearly states there are “Significant and Unavoidable” impacts.
- What is clear* is this is the wrong project for Nevada County.
- ↓
- I urge you to vote NO on this project.

[7] While PRIDE’s facility was considered too small we were awarded the HP contract, and kept it for years, because of HP’s commitment to PRIDE’s mission to create jobs for people with disabilities.  
 [8] There is already a custom milling operation at 11429 East Bennett Rd - Freds Custom Milling and Lumber  
 [9] [www.cleanairtrust.org/trucks.dirtytruth.html](http://www.cleanairtrust.org/trucks.dirtytruth.html)  
 [10] DEIR pages 6-12/13





Thank you.



John J. Vaughan  
11793 Lower Colfax Rd  
Grass Valley, CA 95945  
District III Voter  
916-807-0430 Cell  
jvaughan1946@gmail.com

CC: Director of Planning Brian Foss  
Matt Kelley, Senior Planner  
Principal Planner Tyler Barrington



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## **INDIVIDUAL LETTER 388: JOHN VAUGHAN**

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### **Response to Comment Ind 388-1**

The commenter's opposition to the project is noted for the decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 388-2**

The alternative proposed by the commenter was discussed on pages 6-11 to 6-13 of the DEIR, but was dismissed from further consideration because the surface uses are reasonably anticipated to be more intense and cause more impacts than the proposed project. This would be contrary to CEQA's objectives for an alternative, which is to avoid or substantially lessen any of the significant effects of the project (Section 15126.6(f)). Therefore, this alternative is rejected from further consideration. Comment noted.

### **Response to Comment Ind 388-3**

The comment does not address the adequacy of the DEIR. Comment noted.

### **Response to Comment Ind 388-4**

The commenter asserts that the DEIR is incorrect in its assessment of impacts from uses that are permitted under the current M1-SP zoning, but does not provide specific examples. Please see Master Response 1.

### **Response to Comment Ind 388-5**

The commenter asserts that the traffic impacts and related traffic noise under existing zoning would be less than the project because the vehicles would be passenger cars, small trucks with less large trucks and less trips. The commenter appears to focus on only the less intense permitted uses, but does not acknowledge that the existing zoning allows heavy industrial uses such as large wholesaling and distribution facilities, lumber yards, auto dismantling yards, milling and planing facilities, and contractor equipment and storage yards, among other industrial uses. These types of uses (large wholesaling and distribution facilities, for example) involve far higher volume of heavy truck traffic than proposed by the project, and many of the permitted uses would involve greater noise impacts as the facilities (e.g., milling and planing facilities, auto dismantling) would be on the surface rather than underground as proposed for many aspects of the project.

### **Response to Comment Ind 388-6**

The commenter speculates that many of the more intense uses that are permitted under the current zoning (e.g., distribution facilities and auto dismantler) are not likely to be constructed and should be eliminated from the DEIR's consideration. However, the commenter does not provide evidence as to this opinion other than noting the distance from freeways. Accordingly, the elimination of numerous permitted use categories from consideration of potential impacts is speculative. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary. The commenter states that a milling and planing facility would not be as loud as the project, but offers no evidence of that assertion besides pointing out that a saw mill and planing mill existed on the site for decades. Many of the project's noise-generating activities are underground or enclosed within buildings, which is not acknowledged by the commenter in its comparison. The commenter's opinion that a much lighter



mix of land uses would actually occupy the Brunswick site under existing zoning is speculation and is not substantial evidence under CEQA. Nevertheless, the comment has been forwarded to the decision makers for their consideration.

**Response to Comment Ind 388-7**

Please see Response to Comment Ind 388-6.

**Response to Comment Ind 388-8**

Please see Response to Comment 388-6.

**Response to Comment Ind 388-9**

The commenter asserts that aesthetic impacts could be easily mitigated under an existing zoning alternative. Whether aesthetic impacts could be mitigated to less than significant would depend on the layout and height of the actual buildings and facilities proposed under the existing zoning, or in the case of an auto dismantling yard, the extent and type of screening around the facility. Given that the landscape could change to more intense uses and would be visible from public viewpoints, similar to the project, aesthetic impacts may be similar under the commenter's proposed alternative.

**Response to Comment Ind 388-10**

The commenter's opposition to the project and preference for the No Project alternative is noted for the decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.

**Response to Comment Ind 388-11**

The commenter appears to believe that the existing-zoning alternative was rejected because it was infeasible. However, as discussed on page 6-13 of the DEIR, this alternative was rejected because it could result in more intense uses and environmental impacts as compared to the project, which would be contrary to CEQA's objectives for an alternative. Please see Response to Comment Ind 388-6.

**Response to Comment Ind 388-12**

The commenter's opposition to the project is noted for the decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.



Individual Letter 389

Nevada County Board of Supervisors  
950 Maidu Avenue, Suite 200  
Nevada City, CA, 95959

Date: 02/28/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock:

My name is John Vaughan. I have been a resident of Nevada County since 1967 (55 years). My wife Gail and I live on Lower Colfax Road, approximately 100 yards from the southwest edge of the Rise Gold mineral rights area. Our property is served by a well. We are District III voters.

We do not support the Rise Gold project due to the huge negative impacts on our people, water supplies and property values and urge you to vote NO on the project.

I'd like to highlight one of my many areas of concern with the Draft Environmental Impact Report (DEIR), specifically the lack of inclusion and detailed review of the Nevada County Business and Industrial Center<sup>(1)</sup> (NCBIC) alternative, which with existing M1-SP zoning could include a 54,000 ft<sup>2</sup> Business Park, 242,000 ft<sup>2</sup> for Service Business/Light Manufacturing and 238,000 ft<sup>2</sup> for Industrial uses<sup>(2)</sup>.

I am currently retired but the last 20 years of my career were spent at PRIDE Industries in Roseville. The last 10 of those I was the Senior Vice President of Manufacturing and Logistics, including responsibility for a large distribution contract for Hewlett Packard. We operated a shipping/receiving/distribution warehouse shipping millions of printer parts/year all over the world. Our facility was just over 200,000 square feet with 12 loading docks about 10 minutes from Interstate 80. The in/out diesel truck traffic was 10-15 trucks/day between 6am-6pm. In short, I know a bit about distribution and logistics.

The DEIR Chapter 6 "Alternatives Considered but Dismissed from Further Analysis"<sup>(3)</sup> is incorrect and incomplete. Specifically, in the "No Project" section, the analysis of the currently permitted NCBIC alternative<sup>(4)</sup> contains incomplete information and notes examples of negative impacts that are extremely unlikely to occur in the real world. The DEIR concludes an overall negative impact of these uses and rejects this alternative without adequate review.

In the summary section for the NCBIC alternative<sup>(5)</sup>, the DEIR rejects this option assuming noise, traffic, aesthetics and air quality would be the same or worse for the NCBIC alternative vs. the Rise Gold mine. In virtually all cases for the types of businesses, using existing zoning, that would actually locate there, the traffic and noise would be daytime, mostly weekdays, not 24x7, comprised largely of passenger cars and small trucks with large truck traffic substantially less than the 236 trips/day for the Rise Gold project<sup>(6)</sup> and almost none of the traffic hauling toxic waste.

The DEIR identifies (among others) Distribution Facilities and Auto Dismantling Yards as examples of business that would "...cause substantial noise, traffic, aesthetic and air quality impacts..." While these business types are permitted under existing zoning, the likelihood of such ventures at this location is extremely low. Both Distribution Facilities and Auto Dismantling Yards (and Saw Mills and Planing Mills)

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Ind 389-1



require easy access to major freeways like Interstate 80 and therefore are not realistic for this site. In the case of large 24x7 Distribution Facilities, anything further than 10-15 minutes from a major freeway is not feasible and 238,000 square feet (238K) is too small.<sup>[7]</sup> Even if you attracted a Distribution Facility tenant, 238K would not support enough loading docks to create the same large truck traffic as the Rise Gold Mine project. Additionally, for Distribution Facilities and other permitted businesses, at the scale available at this site, the semi-truck traffic would be limited to weekday or daytime use as small to mid-size facilities are unlikely to operate 24x7. The DEIR also notes that a Milling and Planing Facility “would potentially create noise similar or greater to the proposed project.” Frankly, that’s hard to believe as there was a saw mill and planing mill at that site for decades.<sup>[8]</sup>

Re air quality: The impact on air quality would be greatly reduced with tenants that reflect what would happen in the real world at the NCBIC vs. the unrealistic scenarios in the DEIR.

Re traffic: The DEIR suggests that car and truck traffic to/from the NCBIC would generate the same pollution as the projected traffic to/from the proposed mine, which includes 236 semi-truck trips/day. Each diesel semi-truck emits as much pollution as 150 cars<sup>[9]</sup>. Considering only the diesel semi-trucks, producing the same emissions as 236 trips/day requires 35,400 trips/day from cars and light trucks, an unlikely scenario for the mix of businesses that might actually occupy the NCBIC.

Re aesthetics: Given the site is already zoned for the buildings and businesses noted, aesthetic issues could be easily mitigated and included in a proposal for development of all or part of the NCBIC.

Virtually all of the businesses listed in “Examples of Permitted Uses”<sup>[10]</sup> already exist or have existed in Nevada County without hundreds of local residents protesting about potential traffic, noise, water consumption, water usage or pollution. It seems like a reasonable model to follow to do more of what we already know how to do without changing the nature of our community for the next 80 years. I believe many of the people who oppose this mine would likely support a “No Project” alternative with the NCBIC as the best outcome.

Assigning a “not feasible” label to the NCBIC alternative using unrealistic assumptions makes it appear as if the DEIR authors have not done their homework. I’m not saying that the NCBIC should be built now (or ever), that’s not my decision, but to reject this alternative without a more detailed review using real world scenarios and real world outcomes makes no sense.

Rise Golds advertising “postcard” claims the “Science is Clear”. That’s debatable given that much of their science is based on assumptions and forecasts. The same postcard claims are there are “no significant impacts” while the DEIR clearly states there are “Significant and Unavoidable” impacts.

*What is clear* is this is the wrong project for Nevada County.

I urge you to vote NO on this project.

Thank you.

<sup>[7]</sup> While PRIDE’s facility was considered too small we were awarded the HP contract, and kept it for years, because of HP’s commitment to PRIDE’s mission to create jobs for people with disabilities.

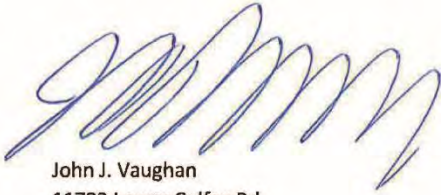
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John J. Vaughan  
11793 Lower Colfax Rd  
Grass Valley, CA 95945  
District III Voter  
916-807-0430 Cell  
jvaughan1946@gmail.com

CC: Matt Kelley, Senior Planner



## **INDIVIDUAL LETTER 389: JOHN VAUGHAN**

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### **Response to Comment Ind 389-1**

This letter is a duplicate copy of Individual Letter 388. Please see comments and responses in Individual Letter 388.



Individual Letter 390

Nevada County Planning Commission  
950 Maidu Avenue, Suite 170  
Nevada City, CA, 95959

Date: 02/28/2022

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Ind 390-1



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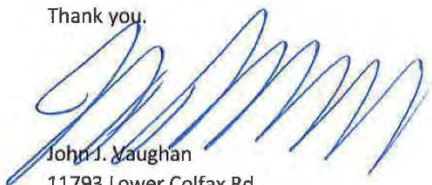
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Thank you.



John J. Vaughan  
11793 Lower Colfax Rd  
Grass Valley, CA 95945  
District III Voter  
916-807-0430 Cell  
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CC: Director of Planning Brian Foss  
Matt Kelley, Senior Planner  
Principal Planner Tyler Barrington





## **INDIVIDUAL LETTER 390: JOHN VAUGHAN**

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### **Response to Comment Ind 390-1**

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**Individual Letter 391**

Nevada County Planning Commission  
950 Maidu Avenue, Suite 170  
Nevada City, CA, 95959

Date: 02/28/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno:

My name is John Vaughan. I have been a resident of Nevada County since 1967 (55 years). My wife Gail and I live on Lower Colfax Road, approximately 100 yards from the southwest edge of the Rise Gold mineral rights area. Our property is served by a well. We are District III voters.

We do not support the Rise Gold project due to the huge negative impacts on our people, water supplies and property values and urge you to vote NO on the project.

I'd like to highlight one of my many areas of concern with the Draft Environmental Impact Report (DEIR), specifically the lack of inclusion and detailed review of the Nevada County Business and Industrial Center<sup>[1]</sup> (NCBIC) alternative, which with existing M1-SP zoning could include a 54,000 ft<sup>2</sup> Business Park, 242,000 ft<sup>2</sup> for Service Business/Light Manufacturing and 238,000 ft<sup>2</sup> for Industrial uses<sup>[2]</sup>.

I am currently retired but the last 20 years of my career were spent at PRIDE Industries in Roseville. The last 10 of those I was the Senior Vice President of Manufacturing and Logistics, including responsibility for a large distribution contract for Hewlett Packard. We operated a shipping/receiving/distribution warehouse shipping millions of printer parts/year all over the world. Our facility was just over 200,000 square feet with 12 loading docks about 10 minutes from Interstate 80. The in/out diesel truck traffic was 10-15 trucks/day between 6am-6pm. In short, I know a bit about distribution and logistics.

The DEIR Chapter 6 "Alternatives Considered but Dismissed from Further Analysis"<sup>[3]</sup> is incorrect and incomplete. Specifically, in the "No Project" section, the analysis of the currently permitted NCBIC alternative<sup>[4]</sup> contains incomplete information and notes examples of negative impacts that are extremely unlikely to occur in the real world. The DEIR concludes an overall negative impact of these uses and rejects this alternative without adequate review.

In the summary section for the NCBIC alternative<sup>[5]</sup>, the DEIR rejects this option assuming noise, traffic, aesthetics and air quality would be the same or worse for the NCBIC alternative vs. the Rise Gold mine. In virtually all cases for the types of businesses, using existing zoning, that would actually locate there, the traffic and noise would be daytime, mostly weekdays, not 24x7, comprised largely of passenger cars and small trucks with large truck traffic substantially less than the 236 trips/day for the Rise Gold project<sup>[6]</sup> and almost none of the traffic hauling toxic waste.

The DEIR identifies (among others) Distribution Facilities and Auto Dismantling Yards as examples of business that would "...cause substantial noise, traffic, aesthetic and air quality impacts..." While these business types are permitted under existing zoning, the likelihood of such ventures at this location is

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[6] 118 round trips, see Table 4.12-8, page 4.12-34



Ind 391-1



extremely low. Both Distribution Facilities and Auto Dismantling Yards (and Saw Mills and Planing Mills) require easy access to major freeways like Interstate 80 and therefore are not realistic for this site. In the case of large 24x7 Distribution Facilities, anything further than 10-15 minutes from a major freeway is not feasible and 238,000 square feet (238K) is too small.<sup>[7]</sup> Even if you attracted a Distribution Facility tenant, 238K would not support enough loading docks to create the same large truck traffic as the Rise Gold Mine project. Additionally, for Distribution Facilities and other permitted businesses, at the scale available at this site, the semi-truck traffic would be limited to weekday or daytime use as small to mid-size facilities are unlikely to operate 24x7. The DEIR also notes that a Milling and Planing Facility “would potentially create noise similar or greater to the proposed project.” Frankly, that’s hard to believe as there was a saw mill and planing mill at that site for decades.<sup>[8]</sup>

Re air quality: The impact on air quality would be greatly reduced with tenants that reflect what would happen in the real world at the NCBIC vs. the unrealistic scenarios in the DEIR.

Re traffic: The DEIR suggests that car and truck traffic to/from the NCBIC would generate the same pollution as the projected traffic to/from the proposed mine, which includes 236 semi-truck trips/day. Each diesel semi-truck emits as much pollution as 150 cars<sup>[9]</sup>. Considering only the diesel semi-trucks, producing the same emissions as 236 trips/day requires 35,400 trips/day from cars and light trucks, an unlikely scenario for the mix of businesses that might actually occupy the NCBIC.

Re aesthetics: Given the site is already zoned for the buildings and businesses noted, aesthetic issues could be easily mitigated and included in a proposal for development of all or part of the NCBIC.

Virtually all of the businesses listed in “Examples of Permitted Uses”<sup>[10]</sup> already exist or have existed in Nevada County without hundreds of local residents protesting about potential traffic, noise, water consumption, water usage or pollution. It seems like a reasonable model to follow to do more of what we already know how to do without changing the nature of our community for the next 80 years. I believe many of the people who oppose this mine would likely support a “No Project” alternative with the NCBIC as the best outcome.

Assigning a “not feasible” label to the NCBIC alternative using unrealistic assumptions makes it appear as if the DEIR authors have not done their homework. I’m not saying that the NCBIC should be built now (or ever), that’s not my decision, but to reject this alternative without a more detailed review using real world scenarios and real world outcomes makes no sense.

Rise Golds advertising “postcard” claims the “Science is Clear”. That’s debatable given that much of their science is based on assumptions and forecasts. The same postcard claims are there are “no significant impacts” while the DEIR clearly states there are “Significant and Unavoidable” impacts.

*What is clear* is this is the wrong project for Nevada County.

I urge you to vote NO on this project.

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Thank you.



John J. Vaughan  
11793 Lower Colfax Rd  
Grass Valley, CA 95945  
District III Voter  
916-807-0430 Cell  
jvaughan1946@gmail.com

CC: Director of Planning Brian Foss  
Matt Kelley, Senior Planner  
Principal Planner Tyler Barrington



## **INDIVIDUAL LETTER 391: JOHN VAUGHAN**

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### **Response to Comment Ind 391-1**

This letter is a duplicate copy of Individual Letter 388. Please see comments and responses in Individual Letter 388.





**Individual Letter 392**

Nevada County Planning Commission  
950 Maidu Avenue, Suite 170  
Nevada City, CA, 95959



Date: 02/28/2022

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Ind 392-1



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## **INDIVIDUAL LETTER 392: JOHN VAUGHAN**

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### **Response to Comment Ind 392-1**

This letter is a duplicate copy of Individual Letter 388. Please see comments and responses in Individual Letter 388.





Individual Letter 393

Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

03/24/2022

Subject: Idaho-Maryland Mine Project Draft Environmental Impact Report

Dear Mr. Kelley,

Please include my project-specific comments and questions in response to the Rise Gold Idaho-Maryland Mine Project Draft Environmental Impact Report (DEIR).

My name is John Vaughan. I have been a resident of Nevada County since 1967 (55 years). My wife Gail and I live on Lower Colfax Road, approximately 100 yards from the southwest edge of the Rise Gold mineral rights area. Our property is served by a well. We are District III voters.

Ind 393-1

I have a number of issues, comments and questions about the adequacy of the DEIR, which is missing key information, underestimates significant negative impacts and proposes inadequate mitigation measures.

This document is organized in categories of "Issues" which are followed by factually supportive commentary, which are then followed by questions, based on the commentary, related to the issue I am concerned about regarding the inadequacy of the DEIR.

**Issue #1: Water Supply for well owners:**

I have serious concerns about how this proposal impacts wells in the area, including those properties not included in the DEIR, outside the studied area along East Bennett Rd.

Ind 393-2

This project will dewater to a depth of 3200 feet<sup>1</sup>, including initial dewatering for approx. 6 months, removing over 815 million gallons, followed by maintenance dewatering, removing 450-750 million gallons/year. **That's over 1 BILLION gallons during the first year** (Enough to cover 43,560 square feet with column of water 3,685 feet deep<sup>2</sup>) **and over 40 billion gallons for the life of the project**. The DEIR acknowledges the significant and unavoidable negative impact of this dewatering but only in the small footprint of East Bennett Rd.

In a Fox40 news video from mid-March 2022<sup>3</sup>, Ben Mossman, CEO of Rise Gold, talks about the maps used for modeling the tunnels are from the "World War II era". The reporter notes the maps reveal "nearly 100 miles of tunnel". It makes no sense that removing 40 billion gallons of water will have no negative impact on water availability in an area much broader than East Bennett Rd. The level of our aquifers are already at risk from years of drought behind and likely ahead of us.

The DEIR notes "the proposed project would result in substantial reduction in groundwater supplies"<sup>4</sup>. For well owners not serviced by NID, this is a "Significant and Unavoidable" issue. The DEIR does require mitigation where properties along East Bennett would be serviced by NID. But that does not solve the

<sup>1</sup> DEIR page 4.8-54

<sup>2</sup> 3,685 acre feet is the same as one acre covered in 3,685 feet of water. One acre = 43,560 square feet.

<sup>3</sup> [www.youtube.com/watch?v=o6HbA2C55ds&t=310s](http://www.youtube.com/watch?v=o6HbA2C55ds&t=310s)

<sup>4</sup> DEIR Chapter 6, Alternatives Analysis page 6-6





Ind 393-3

groundwater issue for other properties which are negatively impacted by groundwater loss where NID is not an option. For these properties, including ours, the impact is "Significant and Unavoidable". The mitigations required in the 1996 Use Permit for Emperor Gold and the 2008 Emgold Mining DEIR are a reasonable starting place for minimal mitigations that are needed today and should be added to the DEIR. These options are not mentioned in the Rise Gold DEIR.

The 1993 final report for groundwater modeling and underground mining at the Siskon Mine on San Juan Ridge, which was approved by the County, and which, just like the Rise Gold proposal, was based on the currently available science at the time, stated: "Water levels in water supply wells surrounding the site are predicted to undergo very little or no impact from mine dewatering." The predictions were wrong. In 1995, there was a breach of an aquifer discharging millions of gallons of water and mine waste into Spring and Shady Creeks. The breach also drained community wells including those of Grizzly Hill School and North Columbia Schoolhouse Cultural Center. In 1997, the Siskon Mine was closed. As the security bond money ran out years ago, Grizzly Hill School continues to pay thousands of dollars/year to maintain a treatment system to provide drinking water for students and staff.<sup>5</sup>

In January 1997, a containment dam at the abandoned Lava Cap Mine (just 5 miles from the Idaho Maryland Mine) failed, releasing ~10,000 cubic yards of arsenic-rich tailings into its watershed including Little Clipper Creek and Lost Lake. Evidence of unsafe mine-related arsenic contamination was found in Little Clipper Creek, Lost Lake, surrounding property and local water wells. The properties around the Little Clipper Creek have been deemed an EPA Superfund site.<sup>6</sup> Since this area was declared an EPA Superfund site, the homeowners have had to test their wells several times/year. To date, all this work has been done at taxpayers' expense. 21 years later, in 2018, a \$32 million judgement was obtained against Elder and Sterling CentreCorp related to cleanup costs. No cleanup has started.

Ind 393-4

This February (2/28/2022), the United Nations Intergovernmental Panel on Climate Change published a report<sup>7</sup> on climate change showing that:

- "...we have zero years left to avoid dangerous climate change, because it's here."
- "...as many as three billion people around the world will experience chronic water scarcity..."
- "...ecosystems and all sectors of human society and human well-being fundamentally depends on water..."
- "A water crisis is already brewing in the Western United States. Multiyear drought has drained reservoirs and triggered unprecedented water cuts for the region,"

On 3/18/2022, The Union newspaper published an article titled "Hot spring forecast: Drought deepens in West, flooding ebbs",<sup>8</sup> A few selected quotes include:

- "There is no relief in sight for the West's record-shattering megadrought..."
- "The reason the West is warming is climate change, especially over the multiple decade timeframe."
- "California has 1.5 million acre feet less water available than it did this time last year."
- "The more than 20-year megadrought...is the worst in 1,200 years and is stoked by...climate change..."

<sup>5</sup> [www.sjrtaxpayers.org/history](http://www.sjrtaxpayers.org/history)

<sup>6</sup> [en.wikipedia.org/wiki/Lava\\_Cap\\_Mine](https://en.wikipedia.org/wiki/Lava_Cap_Mine)

<sup>7</sup> [www.cnn.com/2022/02/28/world/un-ipc-climate-report-adaptation-impacts/index.html](https://www.cnn.com/2022/02/28/world/un-ipc-climate-report-adaptation-impacts/index.html)

<sup>8</sup> The Union, 3/18/2022, Page 5. Source NOAA Meteorologists'



The Nevada County Energy Action Plan, accepted by the Board of Supervisors by vote of 5-0 on 2/12/2019 states the following:<sup>9</sup>

“...Nevada County...faces challenges associated with regional climate change...climate change poses an immediate and escalating threat to the region’s environment, economic strength, and public health. The region is affected by more intense dry periods...and more frequent periods of drought in California...The region is also impacted by a higher proportion of precipitation falling as rain instead of snow...and **shortages in runoff and water supply, as well as substantial changes in runoff patterns and timing. This will affect groundwater recharge...**” [emphasis added]

Goal 3 in the Nevada County Energy Action Plan states: “Encourage the Efficient and Safe Transportation and Use of Water Resources”. While this section focuses mostly on in-home efficiencies, it notes “water losses” a number of times. Pumping 1 billion gallons of water into Wolf Creek in the first year followed by half a billion gallons per year for the following 79 years is a very substantial “water loss”. Some of that water can be reclaimed by a downstream NID water treatment plant but much of it will be “lost” to Nevada County as it flows to the ocean. Please explain how this project is consistent with the water loss goals in the Nevada County Energy Action Plan.

The NID Board Meeting on 2/9/2022 included an agenda item to review the Idaho-Maryland Mine Water Supply Assessment, prepared by Raney Planning and Management (RPM). NID Director Karen Hull, posed a question regarding the impact of climate change on the water models to Mr. Houmao Liu, Ph.D., P.E. from Itasca International, a subcontractor to RPM. Dr. Liu’s credentials are impeccable<sup>10</sup>. His response was a detail review of his analysis, including the statement “...but definitely **we did not look into extensive [impact] of climate change** [emphasis added] because those are not defined into the future.”<sup>11</sup> The DEIR must be amended to include analysis of multiple scenarios that will arise due to climate change over the next 80 years.

Please respond to the following questions regarding the adequacy of the DEIR:

Ind 393-5

- With over 100 miles of tunnels that have not been mapped since World War II and have not been accessed in over 66 years (1956), the DEIR lacks inclusion of the larger area of risk to residential wells included in both the 1996 and 2008 Use Permit/DEIR applications. Please explain.

Ind 393-6

- How will well owners know that an effective pre-dewatering assessment of all wells within and immediately surrounding the Rise Gold mineral rights boundaries will be performed by independent consultants?

Ind 393-7

- For the next 80 years:
  - What systems are in place to remedy a well that is negatively impacted?
  - How will reduced well output (gallons/minute) be monitored?
  - How will well recharging rates be monitored?
  - How will well contamination be monitored?
  - Who determines root cause of degraded well function?
  - Who determines liability?
  - How and how quickly will temporary water provisions be in place when a well fails?

<sup>9</sup> Nevada County Energy Action Plan, Chapter 1, page 6

<sup>10</sup> www.itascainternational.com/about/staff-bios/houmao-liu

<sup>11</sup> NID Board Meeting, 2/9/2022, Dr. Houmao Liu, General Manager/Principal Hydrogeologist, Itasca International





	<ul style="list-style-type: none"> <li>○ Why are the properties of well owners burdened with losing what little assurances are currently proposed if they sell their property?</li> <li>○ What financial systems are in place to provide mitigation funding when issues arise?</li> <li>○ What steps are planned to avoid a disaster like the one at the San Juan Ridge Mine in 1995?</li> <li>○ What steps are planned to avoid a disaster like the one at the Lava Cap Mine in 1997?</li> </ul>
Ind 393-8	<ul style="list-style-type: none"> <li>• What is the justification for why properties with proposed replacement NID water service along East Bennet Rd are required to assume the cost of NID services if the property is annexed into Grass Valley or sold?</li> </ul>
Ind 393-9	<ul style="list-style-type: none"> <li>• How will the DEIR address the real concerns from well owners outside the limited study area along East Bennet?</li> </ul>
Ind 393-10	<ul style="list-style-type: none"> <li>• Why are the mitigations required in 1996 and 2008 not the baseline for the current DEIR analysis?</li> </ul>
Ind 393-11	<ul style="list-style-type: none"> <li>• How has the failure, huge negative impacts, on-going costs and lessons learned from the Siskon Mine in North San Juan been factored into the analysis of the Rise Gold mine?</li> <li>• How has the failure, huge negative impacts, on-going costs and lessons learned from the Lava Cap Mine been factored into the analysis of the Rise Gold mine?</li> </ul>
Ind 393-12	<ul style="list-style-type: none"> <li>• Will Nevada County provide inspectors and support systems to oversee well monitoring, potential contamination and reaction to a spill? If so, who pays these salaries?</li> </ul>
Ind 393-13	<ul style="list-style-type: none"> <li>• If "self-monitoring" and reporting is used, who audits the process used to develop the reports? If audits are performed, how often and who pays the salaries of the auditors?</li> </ul>
Ind 393-14	<ul style="list-style-type: none"> <li>• Why are water models for 80 years when the models are based on maps from the 1940's and "did not look into the extensive impact of climate change because those are not defined into the future"?<sup>12</sup></li> </ul>
Ind 393-15	<ul style="list-style-type: none"> <li>• What steps are being taken to ensure the water models are correct, taking into consideration the "immediate and escalating threat of climate change amid the worst megadrought in 1,200 years?</li> </ul>
Ind 393-16	<ul style="list-style-type: none"> <li>• Have other hydrologists been consulted for peer review of the water models?</li> </ul>
Ind 393-17	<ul style="list-style-type: none"> <li>• Given that Nevada County knows in advance from the DEIR that "the proposed project would result in substantial reduction in groundwater supplies" and knows from the Nevada County Energy Plan that climate change will create "shortages in runoff and water supply, as well as substantial changes in runoff patterns and timing. This will affect groundwater recharge". How can the County justify removing 1 billion gallons of water in the first year followed by half a billion per year for the next 79 years?</li> <li>• What specific steps is Nevada County taking to avoid liability for the above issue?</li> <li>• What are the additional County liability insurance costs related to approval of this project?</li> <li>• How are the costs for additional liability passed down to property owners in the county?</li> </ul>
Ind 393-18	<p>The FEIR needs to analyze all the wells potentially impacted by the project. The DEIR impact analysis on wells outside of Ease Bennett Rd is incomplete and proposes inadequate mitigation measures.</p>
Ind 393-19	<p>For the above reasons, re Issue #1: Water Supply for well owners, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24 and is as out of compliance with the Nevada County Energy Action Plan. Please provide a detailed explanation why this project should be allowed to proceed.</p>
Ind 393-20	<p><b><u>Issue #2: Lack of inclusion and detailed review of the Nevada County Business and Industrial Center<sup>13</sup> (NCBIC) alternative:</u></b> The last 20 years of my career were spent at PRIDE Industries in Roseville. The final</p>

<sup>12</sup> NID Board Meeting, 2/9/2022, Dr. Houmau Liu, General Manager/Principal Hydrogeologist, Itasca International

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<sup>16</sup> DEIR beginning at the bottom of Page 6-11

<sup>17</sup> DEIR bottom of Page 6-13, last 2 paragraphs before "Reduced Hours"

<sup>18</sup> 118 round trips = 236 trips, see DEIR Table 4.12-8, page 4.12-34

<sup>19</sup> While PRIDE's facility was considered too small we were awarded the HP contract, and kept it for years, because of HP's commitment to PRIDE's mission to create jobs for people with disabilities.





Ind 393-21

Re air quality and traffic: The impact on air quality would be greatly reduced with NCBIC tenants that reflect what would happen in the real world vs. the unrealistic scenarios in the DEIR. The DEIR suggests that car and truck traffic to/from the NCBIC would generate the same pollution as the projected traffic to/from the proposed mine, which includes 236 semi-truck trips/day. Each diesel semi-truck emits as much pollution as 150 cars<sup>20</sup>. Considering only the diesel semi-trucks, producing the same emissions as 236 trips/day requires 35,400 trips/day from cars and light trucks, an unlikely scenario for the mix of businesses that might actually occupy the NCBIC.

Re aesthetics: Given the site is already zoned for the buildings and businesses noted, aesthetic issues could be easily mitigated and included in a proposal for development of all or part of the NCBIC.

The DEIR discusses a "Project List"<sup>21</sup> noting 20 projects including "...those that would contribute to the impacts on the same environmental resources, infrastructure, or public services and facilities that would be impacted by the proposed project...". Table 5-1<sup>22</sup> summarizes the scale associated with these 20 projects showing 1,209 Dwelling Units, 23,300ft<sup>2</sup> Office, 119,676 ft<sup>2</sup> Commercial and 471,500 ft<sup>2</sup> Business Park/Industrial. Considering only the "Non-Residential" projects, a couple of items stand out:

- 1) There is business growth in Nevada County at a scale that could be easily accommodated at the NCBIC location. With the NCBIC option available, some of these or similar businesses would have likely considered locating there. None of them would have negative impacts that are "more intensive"<sup>19</sup> than the Rise Gold mine.
- 2) Generally speaking, people who live here understand business growth is good for the local economy. With the exception of the Dorsey Marketplace, which has a number of negative environmental impacts, I have not seen an "anti-growth" outcry from local residents and businesses regarding the projects noted in the "Project List".

Ind 393-22

The DEIR inaccurately states "As demonstrated below, development of the Brunswick Industrial Site<sup>23</sup> with industrial uses, consistent with the current M1-SP zoning, could reasonably be expected to result in above-ground uses that are more intensive in certain respects than the proposed project."<sup>24</sup> The DEIR also notes that the "Environmentally Superior Alternative"<sup>25</sup> would be "Alternative 2, Elimination of the Centennial Industrial Site".

It is clear from my experience, as I am confident one would find from other experts, that the DEIR *does not demonstrate* what it claims. It can be reasonably expected and that with detailed review (vs. exclusion without review) the NCBIC would be found to be the "Environmentally Superior Alternative".

Virtually all of the businesses listed in "Examples of Permitted Uses"<sup>26</sup> already exist or have existed in Nevada County without hundreds of local residents protesting about potential traffic, noise, water consumption, water usage or pollution. A reasonable model to follow would be to do more of what we already know how to do without changing the nature of our community for the next 80 years. I believe many of the people who oppose this mine would likely support a "No Project" alternative with the NCBIC as the best outcome.

<sup>20</sup> [www.cleanairtrust.org/trucks/dirtytruth.html](http://www.cleanairtrust.org/trucks/dirtytruth.html)

<sup>21</sup> DEIR pages 5-4/7

<sup>22</sup> DEIR page 5-7

<sup>23</sup> Brunswick Industrial Site is synonymous with NCBIC

<sup>24</sup> DEIR page 6-11

<sup>25</sup> DEIR page 6-42

<sup>26</sup> DEIR pages 6-12/13





Assigning a "not feasible" label to the NCBIC alternative using unrealistic assumptions makes it appear as if the DEIR authors have not done their homework. To reject this alternative without a more detailed review using real world scenarios and real world outcomes makes no sense.

Please respond to the following questions regarding the adequacy of the DEIR:

- Will the DEIR be updated to include real world scenarios for the NCBIC?
- If not, please explain in detail.
- From a review of the "Project List" noted above, it can be reasonably concluded that the NCBIC would *not* be "more intensive" than the Rise Gold mine. Please explain why the EIR reviews for the "Project List" were not considered before claiming the NCBIC is "not feasible"?
- If the "Project List" projects were contrasted and compared to the Rise Gold mine, please explain the specific areas in the DEIR where those comparisons were made and justified.
- What are the specific measurements, using real world scenarios for noise, traffic, aesthetics and air quality that were done prior to rejecting this alternative?
- If no specific measurements were done, what assumptions, using real world scenarios, were used as the basis to conclude that noise, traffic and aesthetics "could reasonably be expected to result in above-ground uses that are more intensive in certain respects than the proposed project."<sup>27</sup>?
- Why does the DEIR claim "As demonstrated below...could reasonably be expected"<sup>17</sup> when no actual review of real world scenarios was conducted?
- Without detailed review of the NCBIC how can it be reasonably concluded that "Alternative 2, Elimination of the Centennial Industrial Site" is the "Environmentally Superior Alternative"?

For the above reasons, re Issue #2: Lack of inclusion and detailed review of the NCBIC alternative, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24. Please provide a detailed explanation why this project should be allowed to proceed.

**Issue #3: Negative Impacts:** Few, if any, of the 83 negative impacts are fully eliminated by the required mitigations, they are only reduced. Look at the long list of negative impacts, especially the "Significant and Unavoidable" impacts listed in the DEIR<sup>28</sup>.

Chapter 5, section 5-5<sup>29</sup> "Significant Irreversible Environmental Changes" of the DEIR notes that:

"An irreversible environmental change would be considered significant if any [emphasis added] of the following would occur:

- The project would involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of the project would generally *commit future generations* [emphasis added] to similar uses (e.g., a highway provides access to a previously remote area);
- The project involves uses in which *irreversible damage could result from any potential environmental accidents* [emphasis added] associated with the project; or
- The phasing of the proposed consumption of resources is not justified (e.g., the project involves a wasteful use of energy).

The proposed project would likely result in, or contribute to, the irreversible environmental

<sup>27</sup> DEIR page 6-13

<sup>28</sup> DEIR pages 6-7/8

<sup>29</sup> DEIR pages 5-8/9

Ind 393-23

Ind 393-24



changes...".

Among the "Significant and Unavoidable" issues, the DEIR concludes traffic at "SR174/Brunswick" and "Brunswick Road/Sutton Way" cannot be mitigated. Average injury accidents/year for the last 3 years in Nevada County was 405 (CHP Data), including 13 fatalities. With "Significant and Unavoidable" traffic issues, it is statistically likely that more accidents will occur at these intersections.

Please respond to the following questions regarding the adequacy of the DEIR:

Ind 393-25

- Is it acceptable if only a few traffic accidents, including injuries and possibly fatalities, occur because of the Significant and Unavoidable traffic impact?
- If yes, please provide justification for how this benefits Nevada County.
- Is it acceptable if water quality, water supply or property values go down for only a few residents?
- If yes, please provide justification for how this benefits Nevada County.
- Is it acceptable if only a few residents have medical issues from the additional air pollution?
- If yes, please provide justification for how this benefits Nevada County.
- Is it acceptable if we only have one toxic spill during the next 80 years?
- If yes, please provide justification for how this benefits Nevada County.
- Is it acceptable if only a few of the negative impacts have larger than planned repercussions?
- If yes, please provide justification for how this benefits Nevada County.

Ind 393-26

- Why are the significant irreversible environmental changes noted not considered "adverse environmental impacts" under CEQA?

Ind 393-27

- Please explain why this project should proceed, given there are "Significant Irreversible Environmental Changes" including "The project involves uses in which *irreversible damage could result from any potential environmental accidents* [emphasis added] associated with the project".
- Please explain why this project should proceed, given there are "Significant Irreversible Environmental Changes" and "The primary and secondary impacts of the project would generally commit future generations..."<sup>30</sup>, including the grandchildren and great grandchildren of students currently enrolled in Nevada County, to the same use for the next 80 years.
- Why are projects even considered with negative Significant Irreversible Environmental Changes as well as Significant and Unavoidable issues?

Assuming even a few of these negative impacts and possible outcomes are *not acceptable*, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24. Please provide a detailed explanation why this project should be allowed to proceed.

Ind 393-28

**Issue #4: Air Pollution:**

Rise Gold proposes to purchase Carbon Offsets to mitigate greenhouse gas (GHG) emissions during construction<sup>31</sup> and notes "This shall include...for GHG reduction activities within the Nevada County region."<sup>32</sup>

- First, Carbon Offsets are an after the fact solution. Offsets purchased to mitigate GHG during construction "within the Nevada County region"<sup>33</sup> may be acceptable under CEQA, but may not

<sup>30</sup> DEIR pages 5-8/9. Also note this project spans 4 generations.

<sup>31</sup> DEIR Chapter 2, Table 2-1, item 4.3-7(b) Construction GHG Emissions Reductions, page 2-23

<sup>32</sup> DEIR Chapter 2, Table 2-1, item 4.3-7(b), page 2-24

<sup>33</sup> DEIR page 4.3-96





↑	<p>actually mitigate the negative impacts on the people in and around Grass Valley, Nevada City, Alta Sierra, Lake Wildwood and Penn Valley in a reasonable time-frame.</p> <ul style="list-style-type: none"> <li>• Second, there will be on-going emissions from daily operations, not just during construction. For the years following construction, GHG emissions range from 7,000-9,000 Metric Tons(MT)/year<sup>34</sup>. The DEIR uses a threshold of 10,000 MT/year, after construction, to conclude that no mitigation is required. The Air Quality Districts used in the DEIR<sup>35</sup> are not similar to Nevada County and should not be used to set Nevada County's air quality thresholds.</li> </ul>
Ind 393-29	<p>On 2/28/2022, the United Nations Intergovernmental Panel on Climate Change (UNIPCC) published a report<sup>36</sup> showing that:</p> <ul style="list-style-type: none"> <li>• "Greenhouse gas emissions will push warming to 1.5°C"</li> <li>• "The world is already 1.1 degrees Celsius warmer than before industrialization...We are now rapidly barreling toward 1.5 degrees."</li> <li>• "Only by making deep cuts to greenhouse gas emissions, while also removing carbon dioxide from the atmosphere, can we halt the precipitous trend."</li> <li>• "Bottom line is that we have zero years left to avoid dangerous climate change, because it's here."</li> <li>• The chart in the above UNIPCC report shows that at current trends GHG emissions will reach 1.5°C between 2030 and 2050, well before end of the Rise Golds 80-year project.</li> </ul> <p>The California Air Resources Board classifies diesel particulate matter (DPM) as a toxic air contaminant, and estimates that about 70% of the cancer risk the average Californian faces stems from DPM.<sup>37</sup> The American Lung Association gives our community an F grade for ozone levels, designating 105 days per year "unhealthy."<sup>38</sup> During the last two years, wildfires contributed to entire weeks when the Northern Sierra Air Quality Management District labeled Nevada County's air quality "very hazardous." Ongoing climate change, with warmer and drier conditions, intensifies wildfires. Nevada County's air quality is certain to get worse even without the additional pollution from the Rise Gold mine.</p>
Ind 393-30	<p><u>Please respond to the following questions regarding the adequacy of the DEIR:</u></p> <ul style="list-style-type: none"> <li>• Besides Carbon Offsets, what is being done to monitor and mitigate the negative impacts of the Rise Gold project on increased GHG for the people in and around Grass Valley, Nevada City, Alta Sierra, Lake Wildwood and Penn Valley during construction?</li> </ul>
Ind 393-31	<ul style="list-style-type: none"> <li>• Why isn't Nevada County requiring the necessary research to determine the appropriate GHG threshold specifically for the Grass Valley, Nevada City, Alta Sierra, Lake Wildwood and Penn Valley areas, including the negative impact of 7,000-9,000 MT/year of new GHG emissions added during the dangerously unhealthy air quality in the much longer fire and smoke seasons vs. using assumptions from other dissimilar counties?</li> </ul>
Ind 393-32	<ul style="list-style-type: none"> <li>• Given the already serious impacts of climate change, what specific steps will Nevada County take to ensure a net zero impact from this project vs. adding 7,000-9,000 MT/year to the problem?</li> </ul>
Ind 393-33	<ul style="list-style-type: none"> <li>• Understanding the changing impact of climate change for the next 80 years:             <ul style="list-style-type: none"> <li>○ What is being done to mitigate the negative impacts of increased GHG on the people in and around Grass Valley, Nevada City, Alta Sierra, Lake Wildwood and Penn Valley?</li> </ul> </li> </ul>

<sup>34</sup> DEIR Chapter 4, Table 4.3-23, page 4.3-93

<sup>35</sup> DEIR pages 4.3-42/43

<sup>36</sup> [www.cnn.com/2022/02/28/world/un-ipcc-climate-report-adaptation-impacts/index.html](http://www.cnn.com/2022/02/28/world/un-ipcc-climate-report-adaptation-impacts/index.html)

<sup>37</sup> [ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health](http://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health)

<sup>38</sup> [www.lung.org/research/sota/city-rankings/states/california/nevada](http://www.lung.org/research/sota/city-rankings/states/california/nevada)



- How will GHG emissions be monitored to ensure compliance?
- How will 7,000-9,000 MT/year of new GHG emissions added during fire season impact already poor air quality?
- What production mitigations, e.g. fewer diesel trucks/day, will occur at the Rise Gold mine when air quality as measured by the Northern Sierra Air Quality Management District for the Grass Valley, Nevada City, Alta Sierra, Lake Wildwood or Penn Valley areas is “very hazardous”?
- What mitigations will occur if parts of the proposed Rise Gold schedule changes (e.g., more trucks delivering Engineered Fill now vs. later), driving emissions over the thresholds noted in the DEIR?
- How will anyone outside of Rise Gold know about schedule changes that impact GHG emissions?
- Who will do the monitoring?
- How frequently will monitoring data be published?

Ind 393-34

For the above reasons, re Issue #4: Air Pollution, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24. Please provide a detailed explanation why this project should be allowed to proceed.

Ind 393-35

**Issue #5: Trips/Day:** There has been much talk about “100 trips/day” for large trucks which counts “round trips”. It’s actually 200 one-way trips/day for hauling mine waste plus 36 other large truck trips/day<sup>39</sup>. Each trip creates GHG emissions locally that won’t be mitigated by Carbon Offsets from somewhere else in Nevada County. Diesel trucks generate up to 150 times the emissions of passenger vehicles.<sup>40</sup> Producing the same emissions as 236 large truck trips/day requires 35,400 trips/day from cars and light trucks. Following construction, Rise Gold is not required to provide any mitigation for GHG emissions comparable to as many as 35,400 passenger vehicles/day<sup>41</sup>. In addition, traffic issues at “SR174/Brunswick” and “Brunswick Road/Sutton Way” are “Significant and Unavoidable” and cannot be mitigated.<sup>42</sup>

The DEIR notes that the “Environmentally Superior Alternative”<sup>19</sup> would be “Alternative 2, Elimination of the Centennial Industrial Site” yet there are still “Significant and Unavoidable” issues for Transportation.<sup>43</sup>

Please respond to the following questions regarding the adequacy of the DEIR:

Ind 393-36

- Following construction, given the data for GHG “thresholds” is from counties dissimilar to Nevada County, why are no mitigations required for GHG emissions comparable to as many as 35,400 passenger vehicles/day?

Ind 393-37

- Given that the County knows in advance there will be injuries and possibly fatalities directly related to “Significant and Unavoidable” traffic issues, how does Nevada County justify the project at all?
- How will the County compensate victims of vehicle and pedestrian injury accidents and fatalities at intersections where the traffic impact from the Rise Gold project is “Significant and Unavoidable”?

Ind 393-38

- Given that the County knows in advance there will be injuries and possibly fatalities directly related to “Significant and Unavoidable” traffic issues, how does Nevada County avoid significant liability?
- What are the additional liability insurance costs related to approval of this project?

<sup>39</sup> DEIR Chapter 4, Table 4.12-7, page 4.12-33

<sup>40</sup> [www.cleanairtrust.org/trucks.dirtytruth.html](http://www.cleanairtrust.org/trucks.dirtytruth.html)

<sup>41</sup> 236 truck trips/day x the equivalent 150 passenger vehicle trips, see [www.cleanairtrust.org/trucks.dirtytruth.html](http://www.cleanairtrust.org/trucks.dirtytruth.html)

<sup>42</sup> DEIR, 4.12-8, 4.12-10, pages 5-11/12

<sup>43</sup> DEIR, Table 6-1, page 6-44





Ind 393-39

- How are the costs for additional liability passed down to property owners in the county?
- Why are projects even considered with negative Significant and Unavoidable issues?

For the above reasons, re Issue #5: Trips/Day, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24. Please provide a detailed explanation why this project should be allowed to proceed.

**Issue #6: Trust and Financial Stability:** Trust and Financial Stability may not sound like *environmental* issues, but in fact are an overlay on all environmental issues and planned mitigations. How can the County trust an organization led by a CEO who walked away from the Banks Island Mine in British Columbia after they were caught dumping toxic waste, claiming (in part) that they were allowed to “discharge waste into the *environment* [emphasis added]”?<sup>44</sup> Anyone who would make such a claim or believe it’s okay to dump toxic waste into the environment should not be allowed to run a project in Nevada County.

Re Financial Stability: The most recent Rise Gold Corp. Form 10-Q, including its wholly-owned subsidiary Rise Grass Valley Inc., filed with the Securities and Exchange Commission for the quarter ending October 31, 2021 says the following on Page F-5:

“The Company has incurred a loss of \$212,300 for the three-month period ended October 31, 2021 and has accumulated a deficit of \$19,756,777. The ability of the Company to continue as a going concern is dependent on the Company’s ability to maintain continued support from its shareholders and creditors and to raise additional capital and implement its business plan. There is no assurance that the Company will be able to obtain adequate financing in the future or that such financing will be on terms advantageous to the Company. However, the Company has been able to obtain such financings in the past. The consolidated financial statements do not include any adjustments that might be necessary if the Company is unable to continue as a going concern. At October 31, 2021, the Company had working capital of \$474,447 (July 31, 2021 - \$956,524). As such, **these material uncertainties cast a substantial doubt regarding the Company’s ability to continue as a going concern** [emphasis added].”

Page F-20 of the 10-Q document states:

“The Company expects to operate at a loss for at least the next 12 months. It has no agreements for additional financing and cannot provide any assurance that additional funding will be available to finance its operations on acceptable terms in order to enable it to carry out its business plan. There are no assurances that the Company will be able to complete further sales of its common stock or any other form of additional financing. However, the Company has been able to obtain such financings in the past. If the Company is unable to achieve the financing necessary to continue its plan of operations, then it will not be able to carry out any exploration work on the Idaho-Maryland Property or the other properties in which it owns an interest and its business may fail. As such, **these material uncertainties cast a substantial doubt regarding the Company’s ability to continue as a going concern** [emphasis added].”

Please respond to the following questions regarding the adequacy of the DEIR:

<sup>44</sup> [www.thenorthernview.com/news/witnesses-testify-in-court-on-banks-island-mine-disaster](http://www.thenorthernview.com/news/witnesses-testify-in-court-on-banks-island-mine-disaster)





- Why does the DEIR not address how Rise Gold plans to manage this project without the excuse that they were allowed to “discharge waste into the environment”?
- What is the specific plan for when a toxic spill occurs?
- Who takes action?
- Who does the cleanup?
- Who bears the cost?
- Who reviews and modifies procedures to ensure the issue is solved and will not occur again?
- If the answer to the previous question is Rise Gold, who will review their work to ensure the issue is solved and will not occur again?
- How and when will the public have access to information during and after a toxic spill?
- Given the “...substantial doubt regarding the Company’s ability to continue as a going concern” are funds set aside in escrow, before any construction or dewatering starts, to cover the cost of:
  - all required mitigations for the life of the 80 year project?
  - cleanup following a toxic spill?
  - additional NID connections when wells in the Rise Gold mineral rights area but beyond the planned pipeline on East Bennett are negatively impacted?
  - water well replacement for property owners who do not have access to NID?
  - Emergency water supplies for wells that dry up from mine dewatering?
- Given the history associated with Rise Gold’s CEO, what steps are in place to mitigate the conflict of interest associated with self-monitoring and accurate reporting to the County?

For the above reasons, re Issue #6: Trust and Financial Stability, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24. Please provide a detailed explanation why this project should be allowed to proceed.

**Issue #7: 80-Year Plan:** The “80-year” plan is more than unrealistic. The grandchildren and great grandchildren of students currently enrolled at Nevada County schools will still be dealing with the fallout from this project. Rise Gold is owned by an investment group. All such groups have an “exit strategy” before they invest. That plan considers how to make a quick return on their investment. They will not be here for the long-term or to cover the cost of clean-up that will be required when something fails. That’s why they declared **bankruptcy** in British Columbia but the “Management” bio for Ben Mossman at the Rise Gold website says “...he led...a **profitable** gold mine in British Columbia...”<sup>45</sup>. What that conflicting message means is they stayed long enough to make a profit for their investors and then bailed out.

Ind 393-41

Please respond to the following questions regarding the adequacy of the DEIR:

- When Rise Gold is sold to or merged with another mining company what plans are in place to ensure continued compliance and avoid concessions (e.g., the new company saying something like “we can’t continue to operate if we have to continue various mitigations, so provide concessions or risk losing 300+ jobs”)?
- What assurances do the people of Nevada County have that money is set aside now to cover the cost of clean-up and remediation when/if Rise Gold (again) declares bankruptcy?
- If money is set aside up front, what process is used to ensure it’s enough for clean-up and remediation across the 80-year life of this project?

<sup>45</sup> www.risegoldcorp.com/management



- Please explain why this project should proceed given there are “Significant Irreversible Environmental Changes” and “The primary and secondary impacts of the project would generally commit future generations...”<sup>46</sup>, including the grandchildren and great grandchildren of students currently enrolled at schools in Nevada County, to the same use for the next 80 years.

For the above reasons, re Issue #7: 80-Year Plan, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24. Please provide a detailed explanation why this project should be allowed to proceed.

**Issue #8: Incorporation by Reference:** The DEIR document “3.0 Introduction to the Environmental Analysis”<sup>47</sup> notes incorporation by reference of the “Nevada County General Plan Final Environmental Impact Report, dated March 1995 (State Clearinghouse Number 1995102136)” and possibly a DEIR for Dollar General Stores from December 2016 (Dollar General is noted in the footer on all pages). This section refers to technical information “in the above referenced EIR” (the Nevada County General Plan Final EIR).

Ind 393-42

Please respond to the following questions regarding the adequacy of the DEIR:

- What are the specific places where items that are incorporated by reference are used in the Idaho-Maryland Mine Project DEIR?
- In each case, why is the information incorporated by reference?
- Also note that the County website link provided in the DEIR for the referenced document [“Nevada County General Plan Final Environmental Impact Report, dated March 1995 (State Clearinghouse Number 1995102136)”] is incorrect and should be [www.mynevadacounty.com/1065/General-Plan](http://www.mynevadacounty.com/1065/General-Plan).<sup>48</sup>

Nevada County’s General Plan, as approved by the Board of Supervisors, following thousands of hours of work and thousands of dollars in cost, has the following four Central Themes:

Ind 393-43

- Fostering a rural quality of life.
- Sustaining a quality environment.
- Development of a strong diversified, sustainable local economy.
- Planned land use patterns will determine the level of public services appropriate to the character, economy and environment of each region.

Please provide detailed reasoning why the Rise Gold Idaho-Maryland Mine Project should be approved when:

Ind 393-44

- The DEIR includes “Significant and Unavoidable” issues, which by definition cannot be addressed.
- The serious concerns noted in my questions and commentary, re Issues 1-7 above have not been adequately addressed in the DEIR.
- Lack of compliance with
  - at least 2 Central Themes of the Nevada County General Plan
  - Nevada County General Plan Policy 17.14
  - Nevada County General Plan Policy 17.24 including “All other related impacts shall [emphasis added] also be addressed.”

Ind 393-45

- The Nevada County Energy Action Plan

<sup>46</sup> DEIR pages 5-8/9

<sup>47</sup> DEIR pages 3.0-2/3

<sup>48</sup> 1/28/22 email from Matt Kelley



Sincerely,



John J. Vaughan  
11793 Lower Colfax Rd  
Grass Valley, CA 95945  
District III Voter  
916-807-0430 Cell  
[jvaughan1946@gmail.com](mailto:jvaughan1946@gmail.com)





Planning Commission Public Comments, 03/24/2022

Ind 393-46

My name is John Vaughan. I have been a resident of Nevada County since 1967. My wife Gail and I live at 11793 Lower Colfax Road, approximately 100 yards from the southwest edge of the Rise Gold mineral rights area. We are District III voters.

The last 10 years of my career I was the Senior Vice President of Manufacturing and Logistics at a non-profit in Roseville with responsibilities including a distribution contract for the world's largest printer manufacturer, shipping millions of printer parts per year all over the world.

I have many concerns with the Draft EIR and am submitting my written comments today.

One that stands out is the lack of inclusion and review of a previously approved use for the Idaho Maryland site, which is the Nevada County Business and Industrial Center.

As already approved and zoned, this alternative could include a 54,000ft<sup>2</sup> Business Park, 242,000ft<sup>2</sup> for Service Business/Light Manufacturing and 238,000ft<sup>2</sup> for Industrial uses.

The Draft EIR wrongly concludes a negative impact and rejects this alternative assuming the impact would be the same or worse than the Rise Gold mine. Unlike Rise Gold, in virtually all cases in the real world, for the types of businesses that would actually locate there, the traffic would be comprised largely of passenger cars and small trucks operating in the daytime, mostly weekdays and not 24x7. Diesel truck traffic would be substantially less than the 236 trips per day for the Rise Gold project. The scale and location of this site would not support large Distribution Facilities, Auto Dismantlers or Planing Mills as claimed in the Draft EIR.

My written comments include more specific details about why the Draft EIR conclusions regarding the Business and Industrial Center alternative are inadequate.

To reject this alternative without a more detailed review using real world scenarios and real world outcomes makes no sense. I believe that with adequate review the Business and Industrial Center will prove to be the environmental superior alternative.

This is the wrong project for Nevada County.

Thank you for the work you are doing and for your time today.

Ind 393-47



Witnesses testify in court on Banks Island Mine disaster – Prince Rupert... <https://www.thenorthernview.com/news/witnesses-testify-in-court-on-ba...>



## Witnesses testify in court on Banks Island Mine disaster

Former safety manager shares photos of waste from the mine site spilling into the environment

SHANNON LOUGH / Sep. 26, 2017 5:30 a.m. / LOCAL NEWS / NEWS

Two years after the Ministry of Environment ordered Banks Island Gold Mine to shut down its operations for environmental infractions, the province is now taking the company's ex-president, mine manager and aquatic biologist to court.

One of the first witnesses to take the stand was former safety manager of the site, Brent Edmunds. With 40 years in the mining industry, Edmunds was hired in April 2015 and once on site, he said he saw many labour issues and he was alerted about uncontained spillage. In May 2015, he toured the site and took photos of liquid discharge from the mine.

"All these tailings were all over the place," he said to the





Witnesses testify in court on Banks Island Mine disaster – Prince Rupert... <https://www.thenorthernview.com/news/witnesses-testify-in-court-on-ba...>

*Northern View*, a day after his testimony.

He took photos of mill tailings, waste product from the mine, leaking into a creek at one site, and flowing into a swamp and lake area at another site.

Edmunds said he made an anonymous tip regarding concerns he had over the health and safety of many of the Indigenous employees.

"It's only because of God's grace that some one was not killed there while they were operating," he said, regarding one incident in particular where he witnessed people going into the mine without ventilation.

"I felt powerless to stop it."

He said he also sent photos and documents to the Inspector of Mines, and included the Ministry of Environment in the email. In June, he returned home for his two weeks off and never returned to the site.

"I was fired because I was trying to do my job," he said.

RELATED: BANKRUPT MINING COMPANY NOW FACES 35 CHARGES FOR BANKS ISLAND MESS

In response to Edmunds, defence attorney, Chilwin Cheng said in an email that "Banks Island chose not to engage Mr. Edmunds after his probationary period ended. He was not dismissed. His departure coincided with the temporary layoff of a number of employees of Banks Island Gold after the government issued its shutdown order in early July."

The Yellow Giant Gold Mine on Banks Island within the



Witnesses testify in court on Banks Island Mine disaster – Prince Rupert... <https://www.thenorthernview.com/news/witnesses-testify-in-court-on-ba...>

Gitxaala Nation was shut down on July 15 by the Ministry of Energy and Mines.

Former CEO of now-bankrupt Banks Island Gold Mine Ltd., Benjamin Mossman, as well as mine manager, Dirk Meckert, and aquatic biologist Allegra Cairns are facing 35 charges under the federal Fisheries Act, provincial Environmental Management Act and Water Act.

Mossmann and Meckert's attorney, Cheng, is asking the Crown counsel to drop the charges.

The defence claims they received a permit from the ministry containing an error that led to them to believe they were allowed to "discharge waste into the environment."

The Gitxaala Environmental Monitoring (GEM) team based in Prince Rupert has been attending the court case to report back to the community.

"GEM on behalf of Kitkatla Nation are happy to see it going to trial and we're watching it intently. We're interested to see what the results of the trial will be," said James Herbert, regulatory affairs manager, GEM.

Last week, aquatic biologist Cairns took the stand as the Crown's first witness, more testimonies are expected to come from the mining inspectors. The next court date is set for Oct. 10.

The Yellow Giant mining site on Banks Island is still under remediation. The Ministry of Energy, Mines and Petroleum Resources stated in an email that it had removed all hazardous materials by May 2016. In June 2017, the ministry set up a site-wide water quality monitoring program to



Witnesses testify in court on Banks Island Mine disaster – Prince Rupert... <https://www.thenorthernview.com/news/witnesses-testify-in-court-on-ba...>

determine areas needing remediation.

Remediation has cost the ministry approximately \$250,000 out of the \$420,000 confiscated from Banks Island Gold Ltd.'s reclamation security deposit.

The ministry said it has shared the final reclamation and closure plan with the Gitxaala First Nation and will continue to work with them until the program has been completed.

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[shannon.lough@thenorthernview.com](mailto:shannon.lough@thenorthernview.com)

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Mine sediments flow toward a lake from the Yellow Giant Gold Mine on Banks Island. This photo was taken in June 2015 by former mine safety manager Brent Edmunds. (Brent Edmunds photo)





## **INDIVIDUAL LETTER 393: JOHN VAUGHAN**

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### **Response to Comment Ind 393-1**

The commenter states the DEIR is inadequate. Please see Master Response 1 and the responses to specific comments provided below.

### **Response to Comment Ind 393-2**

The commenter states that the DEIR acknowledges that dewatering will have a significant and unavoidable impact. This is incorrect, as the DEIR concludes that the project will have a less than significant impact with regard to dewatering and water supply after implementation of mitigation. The commenter asserts that the DEIR's mitigation does not address impacts to properties outside of the anticipated drawdown area. While the DEIR does not require installation of an NID pipeline beyond the 30 properties that are to be provided with the option of connecting to NID water supply, the DEIR does include a groundwater well monitoring plan designed to detect any unexpected drawdown impacts outside of the anticipated area of effect, and requires immediate replacement of water supply by the mine operator for any significant impacts to those wells pursuant to Mitigation Measure 4.8-2(b) and General Plan Policy 17.12. Please see Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and with regard to the commenter's reference to the Emgold and Emperor projects, see Master Response 13 - Historic Hydrogeologic Assessments.

As noted in Master Response 15, the applicant has also provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

### **Response to Comment Ind 393-3**

The commenter references two different mining projects that resulted in unexpected water supply and water quality impacts. Notably, the proposed project is in a different location with different geologic settings than the referenced projects, so the impacts from those projects are not directly comparable. Nonetheless, the County has seriously considered the potential impacts of the project to water supply and quality, prepared thorough analysis of those impacts in Chapter 4.8 of the DEIR, imposed mitigation measures to ensure that any impacts are mitigated, and hired an independent expert to peer review and provide input on the analysis. Please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells. With regard to the commenter's concern over potential breach of a tailings dam, the project does not propose a tailings dam. Please see Chapter 3 of the DEIR.

### **Response to Comment Ind 393-4**

The commenter provides information on climate change, drought and the Nevada County Energy Action Plan. Additionally, the commenter asserts that the DEIR did not adequately assess climate change, and cites a statement from Dr. Houmau Liu that Itasca did not look into climate change as part of the groundwater model. While the DEIR does consider variations in whether events such as multiple dry years and storm events, the impact of climate change in connection with the project is speculative; and therefore, not required to be analyzed under CEQA. Please see Master Response 16 - Drought and Climate Change, and Master Response 25 - Nevada County Energy Action Plan.



### **Response to Comment Ind 393-5**

The commenter asserts that the existing mine tunnels have not been mapped since the World War II era, and therefore the DEIR did not adequately assess groundwater impacts to the larger area. The location of the underground mine works is documented in historic materials from the prior mining operations and was used as part of the groundwater model. There is no evidence to suggest that there are significant underground mine works that are unmapped or that these would change the groundwater analysis. Please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 13 - Historic Hydrogeologic Assessments.

### **Response to Comment Ind 393-6**

The implementation of mitigation required in Chapter 4.8 of the DEIR to monitor groundwater levels and mitigate any impacts is under the authority of Nevada County, who has enforcement authority to ensure compliance. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells. As also noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

### **Response to Comment Ind 393-7**

The commenter asks how the required monitoring and water replacement mitigation will be implemented. The implementation of mitigation required in Chapter 4.8 of the DEIR to monitor groundwater levels and mitigate any impacts is under the authority of Nevada County, who has enforcement authority to ensure compliance. Mitigation Measure 4.8-2(b) and General Plan Policy 17.12 require an immediate replacement of water supply at the expense of the Mine Operator. The threshold of significance for groundwater well impacts was determined in the DEIR to be a reduction of 10% of the well water column. See Chapter 4.8 and Appendix K.9 of the DEIR. The Well Mitigation Plan (Appendix K.9) has been modified to clarify actions that would be taken under the well mitigation plan outside of the E. Bennett Road area. Please see Appendix D to this Final EIR for a revised Well Mitigation Plan, and Master Response 15 - Adequacy of Groundwater Monitoring Wells regarding the applicant's commitment to conduct monitoring of domestic wells within the predicted 1-foot drawdown contour.

Please see Response to Comment Ind 393-3 regarding the San Juan Ridge Mine and Lava Cap Mine.

### **Response to Comment Ind 393-8**

The commenter asks why properties that are annexed into Grass Valley or sold would not receive payment for the cost of water supply. Please see Response to Comment Agcy 10-6.

### **Response to Comment Ind 393-9**

The commenter questions how impacts to wells outside the East Bennett area will be addressed. Please see Mitigation Measures 4.8-2(a) and 4.8-2(b) and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 393-10**

The commenter asks why mitigation proposed for previous projects in 2008 and 1996 are different than the mitigation proposed for the project. Please see Master Response 13 - Historic





Hydrogeologic Assessments and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

**Response to Comment Ind 393-11**

Please see Response to Comment Ind 393-3 regarding the San Juan Ridge Mine and Lava Cap Mine.

**Response to Comment Ind 393-12**

With regard to well monitoring, please see Mitigation Measure 4.8-2(a). Groundwater-level information shall be obtained from the project's groundwater monitoring wells and collected on a quarterly basis, and submitted in report form to the Nevada County Environmental Health Department. The County typically charges permit holders for inspections and other costs associated with enforcement and monitoring of permit conditions. The same would apply to Rise's project. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, regarding the applicant's commitment to monitor domestic wells within the predicted 1-foot drawdown contour.

Spills would be reported to the Central Valley Regional Water Quality Control board in compliance with regulations of the State of California. See Chapter 4.8 of the DEIR.

**Response to Comment Ind 393-13**

The County has authority over enforcement of all required mitigation measures and conditions of approval through the Mitigation Monitoring and Reporting Program (Chapter 4 of this Final EIR). To the extent that certain conditions or mitigation measures include self-monitoring, the County has enforcement authority to ensure compliance. The County typically charges permit holders for inspections and other costs associated with enforcement and monitoring of permit conditions. The same would apply to Rise's project.

**Response to Comment Ind 393-14**

Please see Master Response 13 – Historic Hydrogeologic Assessments, and Master Response 16 - Drought and Climate Change. The groundwater model incorporated historic data and current data to set the proper existing conditions baseline as required by CEQA.

**Response to Comment Ind 393-15**

To ensure accuracy of the analysis, the County hired an independent expert to review and provide input on the groundwater model, impact analysis and mitigation measures. The independent expert's comments have been incorporated into the analysis and mitigation. Please see Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

**Response to Comment Ind 393-16**

As discussed in Response to Comment Ind 393-15, the County's independent expert, West Yost, peer-reviewed the hydrogeology studies as disclosed in Chapter 4.8 of the DEIR.

**Response to Comment Ind 393-17**

The water that is being pumped from the underground mine workings is not being disposed of such that it is wasted. Rather, the water will be treated to State permit standards and discharged into South Fork Wolf Creek, where it can be used by NID for water customers in the County or used by other downstream water users. Liability and insurance costs are not within the scope of



CEQA analysis, but these comments have been forwarded to the decision makers for their consideration.

### **Response to Comment Ind 393-18**

Please see Responses to Comments Ind 393-7, Ind 393-7, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 393-19**

The commenter asserts that the project is inconsistent with the General Plan and is inconsistent with the Nevada County Energy Action Plan. Please see Master Response 25 - Nevada County Energy Action Plan. General Plan Policy 17.14 requires existing development to be protected from impacts caused by mining. The DEIR provides extensive mitigation measures and conditions of approval to protect already existing development - commercial, residential, and community - as well as undeveloped private lands, from adverse environmental effects caused by mining. Accordingly, the DEIR found that the project is consistent with General Plan Policy 17.14.

General Plan Policy 17.24 requires subsurface mining to be conditionally approved only after environmental review under CEQA is completed to address surface land uses, water quantity and quality, noise and vibration, land subsidence, and traffic associated with surface access. The DEIR provides extensive analysis and mitigation measures regarding the listed impacts on the environment in compliance with CEQA. Accordingly, the DEIR found that the project is consistent with General Plan Policy 17.24.

### **Response to Comment Ind 393-20**

This comment is redundant with comments from Individual Comment Letter 388. See Responses to Comments Ind 388-3 through Ind 388-6.

### **Response to Comment Ind 393-21**

This comment is redundant with comments from Individual Letter 388. Please see Responses to Comments Ind 388-7 through Ind 388-9.

### **Response to Comment Ind 393-22**

This comment is similar to comments from Individual Letter 388. Please see Responses to Comments Ind 388-10 through Ind 388-12.

### **Response to Comment Ind 393-23**

This comment is redundant with comments from Individual Letter 388. Please see Responses to Comments Ind 388-1 through Ind 388-12.

### **Response to Comment Ind 393-24**

The commenter states that it is likely that more accidents will occur at the two intersections, where project traffic would result in a significant and unavoidable impact, but provides no evidence.

CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.”

It is also noted that the DEIR includes mitigation for the two impacted intersections. For example, while the DEIR concludes that the proposed project would have a significant and unavoidable impact to the SR 174/Brunswick Road intersection, Mitigation Measure 4.12-1(b) of the DEIR



requires the applicant to enter into a Traffic Mitigation Agreement with the County regarding the SR 174/Brunswick Road intersection. The Agreement shall require the applicant to pay the project's fair share contribution toward the improvements necessary to improve intersection operations to an acceptable level. The Agreement shall include the fair share calculations and total payment amount. Based on the Caltrans methodology to assess fair share, it is estimated that the fair share percentage is 14.9%. While the project is contributing toward addressing its contribution of traffic to the SR 174/Brunswick Road intersection, the remaining funding needed to improve the intersection (e.g., signalization) is not yet certain, nor secured. As a result, the DEIR conservatively concludes that the impact would remain significant and unavoidable.

Regarding the Brunswick Road/Sutton Way intersection, with project traffic, queues in the northbound left turn lanes of the intersection would exceed the threshold of significance. Re-timing of the Brunswick Road/Sutton Way intersection is required by Mitigation Measure 4.12-10 of the DEIR and would maintain LOS C conditions (29.5 seconds per vehicle) with queues declining for this movement. As such, implementation of MM 4.12-10 would reduce the potential impact to a less-than-significant level. However, because the intersection is within the jurisdiction of the City of Grass Valley, Nevada County does not have legal authority to impose this mitigation measure and ensure its eventual outcome. As a result, the impact is conservatively determined to be significant and unavoidable.

### **Response to Comment Ind 393-25**

Please see Response to Comment Ind 393-24 regarding traffic accidents.

Water quality and water supply are analyzed in Chapter 4.8 of the DEIR.

With regard to economic issues and property values, please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

With regard to air quality, please see Chapter 4.3 of the DEIR and Master Response 18 - Air Quality Thresholds.

With regard to "toxic spills" see Chapters 4.7 and 4.8 of the DEIR. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

While many of the project-related concerns noted by the commenter were not identified as significant and unavoidable in the DEIR, it is noted that under CEQA Guidelines Section 15043, the County maintains the authority to approve projects despite significant and unavoidable environmental effects under certain circumstances. Should the Nevada County Board of Supervisors seek to move forward with certifying this EIR and approving the project entitlements, due to the significant and unavoidable impacts that would occur with implementation of the project, the Board would be required to adopt a Statement of Overriding Considerations. The Statement of Overriding Considerations would publicly disclose the process by which the Board weighs the environmental impacts of the project against any other factors. As enumerated in Section 15093 of the CEQA Guidelines, factors to be balanced by the Board when considering projects that would result in a significant and unavoidable environmental impact include economic, legal, social, and technological benefits of projects as well as region-wide or statewide environmental benefits.



### **Response to Comment Ind 393-26**

Analysis of significant irreversible environmental changes is a distinct topic of analysis mandated by CEQA Guidelines, Section 15126.2, which is distinct from CEQA's requirement to assess potentially significant impacts in individual resource areas (e.g., noise, traffic, air quality).

### **Response to Comment Ind 393-27**

Any project that consumes non-renewable energy or mines non-renewable resources would be considered to cause significant irreversible environmental changes. The commenter's suggestion that any project with significant irreversible environmental changes is inconsistent with the General Plan is untenable and would result in the rejection of virtually every project. If the project is approved by the County, the reasons for approval will be outlined in the CEQA findings and the Statement of Overriding Considerations, as discussed in Response to Comment Ind 393-25.

### **Response to Comment Ind 393-28**

Please see Master Response 27 - Greenhouse Gas Thresholds, and Master Response 28 - Greenhouse Gas Credits.

### **Response to Comment Ind 393-29**

Please see Master Response 27 - Greenhouse Gas Thresholds, Master Response 18 - Air Quality Thresholds, and Master Response 166 – Drought and Climate Change.

### **Response to Comment Ind 393-30**

Climate change is a global issue and not only a project specific issue. The project's incremental contribution of GHG emissions would be less than cumulatively considerable (see page 4.3-95 of the DEIR).

### **Response to Comment Ind 393-31**

The County determined that 10,000 MT/year of CO<sub>2</sub> equivalent GHG emissions is the proper CEQA threshold to apply to the project. Please see Master Response 27 - Greenhouse Gas Thresholds. Greenhouse gas emissions are not included in health risk assessments, as they are not considered toxic air contaminants. Please see Chapter 4.3 of the DEIR.

### **Response to Comment Ind 393-32**

Please see Master Response 27 - Greenhouse Gas Thresholds. The project is not required to achieve net zero GHG emissions.

### **Response to Comment Ind 393-33**

Please see Chapter 4.3 of the DEIR, Master Response 18 - Air Quality Thresholds, and Master Response 27 - Greenhouse Gas Thresholds. The project is not required to monitor or publish emissions of GHG. GHG emissions during fire season would not cause a direct air quality impact as GHG emissions are not toxic air contaminants or criteria air pollutants. Climate change is a global impact and not specific to the individual communities listed by the commenter, thus individual analysis of those communities is not required by CEQA.

### **Response to Comment Ind 393-34**

Air quality impacts from the project are less than significant after mitigation. Please see Chapter 4.3 of the DEIR. If the project is approved by the County, the reasons for approval will be outlined in the CEQA findings and the Statement of Overriding Considerations.



### **Response to Comment Ind 393-35**

GHG emissions attributable to trucks has been analyzed in the DEIR. Please see Chapter 4.3 of the DEIR. Please also see Response to Comment 393-24 regarding significant traffic impacts.

The commenter notes that the DEIR identifies Alternative 2, Elimination of the Centennial Industrial Site, as the environmentally superior alternative, but said alternative still has significant and unavoidable issues for transportation. What the commenter does not mention is that Alternative 2 would eliminate one significant project-related noise impact (DEIR, p. 6-28). This is the impact related to potential use of Jake brakes along the haul route connecting the Brunswick and Centennial Industrial Sites. The EIR determined that the proposed project could result in a substantial increase in ambient noise levels in the vicinity of the project due to haul truck traffic should Jake brakes be used. As also noted on page 6-29, implementation of Alternative 2 would also eliminate the truck turning movements along Whispering Pines Lane into the Centennial Industrial Site driveway; thus, widening along the Centennial Industrial Site's frontage for purposes of facilitating adequate truck turn movements into and out of the Site would not be required for this Alternative. Alternative 2 would also eliminate certain project-related pavement impacts along the haul route from the Brunswick to Centennial Sites.

As discussed on page 6-2 of the DEIR, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6[b]). Alternative 2 would avoid some of the proposed project's impacts, and therefore, meets the CEQA requirement for an alternative.

### **Response to Comment Ind 393-36**

Please see Master Response 27 - Greenhouse Gas Thresholds.

### **Response to Comment Ind 393-37**

The commenter states that it is likely that more accidents will occur at intersections due to project traffic but provides no evidence for this argument.

CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." Please also see Response to Comment Ind 393-24.

Liability insurance is not an environmental issue requiring analysis under CEQA.

### **Response to Comment Ind 393-38**

Please see Response to Comment Ind 393-37.

### **Response to Comment 161-39**

Please see Responses to Comments Ind 393-19 and Ind 393-25.

### **Response to Comment Ind 393-40**

Please see Master Response 3 - Operator Responsibility. Please see Response to Comment Ind 393-19 regarding General Plan Policy consistency.





**Response to Comment Ind 393-41**

Please see Master Response 3 - Operator Responsibility, and Master Response 1 - Non-EIR/Administrative Issues.

**Response to Comment Ind 393-42**

Documents used directly in an EIR's impact analysis are typically included in the appendices (e.g., technical studies performed specifically for the project). However, outside documents that only indirectly relate to the project are sometimes incorporated by reference into an EIR to avoid inflating the length of the EIR and its appendices to an unmanageable size. Citations are provided for referenced documents, so that readers can locate those documents if desired.

**Response to Comment Ind 393-43**

Please see Response to Comment Ind 393-19 regarding General Plan Policy consistency. General Plan consistency was analyzed in the DEIR, which concluded that the project is generally consistent with the General Plan. If the project is approved by the County, the reasons for approval will be outlined in the CEQA findings and the Statement of Overriding Considerations, as discussed in Response to Comment Ind 393-25.

**Response to Comment Ind 393-44**

Please see Response to Comment Ind 393-43.

**Response to Comment Ind 393-45**

Please see Master Response 25 - Nevada County Energy Action Plan.

**Response to Comment Ind 393-46**

The comment does not address the adequacy of the DEIR. Comment noted.

**Response to Comment Ind 393-47**

This comment is redundant with comments from Individual Letter 388. Please see Responses to Comments Ind 388-1 through Ind 388-12.



Individual Letter 394

RECEIVED

Dist 3

Nevada County Board of Supervisors  
950 Maidu Avenue, Suite 200  
Nevada City, CA, 95959

MAR 03 2022  
NEVADA COUNTY  
BOARD OF SUPERVISORS

Date: 02/28/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock:

My name is John Vaughan. I have been a resident of Nevada County since 1967 (55 years). My wife Gail and I live on Lower Colfax Road, approximately 100 yards from the southwest edge of the Rise Gold mineral rights area. Our property is served by a well. We are District III voters.

We do not support the Rise Gold project due to the huge negative impacts on our people, water supplies and property values and urge you to vote NO on the project.

I'd like to highlight one of my many areas of concern with the Draft Environmental Impact Report (DEIR), specifically the lack of inclusion and detailed review of the Nevada County Business and Industrial Center<sup>[1]</sup> (NCBIC) alternative, which with existing M1-SP zoning could include a 54,000 ft<sup>2</sup> Business Park, 242,000 ft<sup>2</sup> for Service Business/Light Manufacturing and 238,000 ft<sup>2</sup> for Industrial uses<sup>[2]</sup>.

I am currently retired but the last 20 years of my career were spent at PRIDE Industries in Roseville. The last 10 of those I was the Senior Vice President of Manufacturing and Logistics, including responsibility for a large distribution contract for Hewlett Packard. We operated a shipping/receiving/distribution warehouse shipping millions of printer parts/year all over the world. Our facility was just over 200,000 square feet with 12 loading docks about 10 minutes from Interstate 80. The in/out diesel truck traffic was 10-15 trucks/day between 6am-6pm. In short, I know a bit about distribution and logistics.

The DEIR Chapter 6 "Alternatives Considered but Dismissed from Further Analysis"<sup>[3]</sup> is incorrect and incomplete. Specifically, in the "No Project" section, the analysis of the currently permitted NCBIC alternative<sup>[4]</sup> contains incomplete information and notes examples of negative impacts that are extremely unlikely to occur in the real world. The DEIR concludes an overall negative impact of these uses and rejects this alternative without adequate review.

In the summary section for the NCBIC alternative<sup>[5]</sup>, the DEIR rejects this option assuming noise, traffic, aesthetics and air quality would be the same or worse for the NCBIC alternative vs. the Rise Gold mine. In virtually all cases for the types of businesses, using existing zoning, that would actually locate there, the traffic and noise would be daytime, mostly weekdays, not 24x7, comprised largely of passenger cars and small trucks with large truck traffic substantially less than the 236 trips/day for the Rise Gold project<sup>[6]</sup> and almost none of the traffic hauling toxic waste.

The DEIR identifies (among others) Distribution Facilities and Auto Dismantling Yards as examples of business that would "...cause substantial noise, traffic, aesthetic and air quality impacts..." While these business types are permitted under existing zoning, the likelihood of such ventures at this location is extremely low. Both Distribution Facilities and Auto Dismantling Yards (and Saw Mills and Planing Mills)

<sup>[1]</sup> DEIR page 6-11, Nevada County Ordinance 1853, February 1994

<sup>[2]</sup> DEIR page 6-11/12

<sup>[3]</sup> DEIR page 6-8

<sup>[4]</sup> Beginning at the bottom of Page 6-11

<sup>[5]</sup> Bottom of Page 6-13, last 2 paragraphs before "Reduced Hours"

<sup>[6]</sup> 118 round trips, see Table 4.12-8, page 4.12-34

Ind 394-1



require easy access to major freeways like Interstate 80 and therefore are not realistic for this site. In the case of large 24x7 Distribution Facilities, anything further than 10-15 minutes from a major freeway is not feasible and 238,000 square feet (238K) is too small.<sup>[7]</sup> Even if you attracted a Distribution Facility tenant, 238K would not support enough loading docks to create the same large truck traffic as the Rise Gold Mine project. Additionally, for Distribution Facilities and other permitted businesses, at the scale available at this site, the semi-truck traffic would be limited to weekday or daytime use as small to mid-size facilities are unlikely to operate 24x7. The DEIR also notes that a Milling and Planing Facility “would potentially create noise similar or greater to the proposed project.” Frankly, that’s hard to believe as there was a saw mill and planing mill at that site for decades.<sup>[8]</sup>

Re air quality: The impact on air quality would be greatly reduced with tenants that reflect what would happen in the real world at the NCBIC vs. the unrealistic scenarios in the DEIR.

Re traffic: The DEIR suggests that car and truck traffic to/from the NCBIC would generate the same pollution as the projected traffic to/from the proposed mine, which includes 236 semi-truck trips/day. Each diesel semi-truck emits as much pollution as 150 cars<sup>[9]</sup>. Considering only the diesel semi-trucks, producing the same emissions as 236 trips/day requires 35,400 trips/day from cars and light trucks, an unlikely scenario for the mix of businesses that might actually occupy the NCBIC.

Re aesthetics: Given the site is already zoned for the buildings and businesses noted, aesthetic issues could be easily mitigated and included in a proposal for development of all or part of the NCBIC.

Virtually all of the businesses listed in “Examples of Permitted Uses”<sup>[10]</sup> already exist or have existed in Nevada County without hundreds of local residents protesting about potential traffic, noise, water consumption, water usage or pollution. It seems like a reasonable model to follow to do more of what we already know how to do without changing the nature of our community for the next 80 years. I believe many of the people who oppose this mine would likely support a “No Project” alternative with the NCBIC as the best outcome.

Assigning a “not feasible” label to the NCBIC alternative using unrealistic assumptions makes it appear as if the DEIR authors have not done their homework. I’m not saying that the NCBIC should be built now (or ever), that’s not my decision, but to reject this alternative without a more detailed review using real world scenarios and real world outcomes makes no sense.

Rise Golds advertising “postcard” claims the “Science is Clear”. That’s debatable given that much of their science is based on assumptions and forecasts. The same postcard claims there are “no significant impacts” while the DEIR clearly states there are “Significant and Unavoidable” impacts.

*What is clear* is this is the wrong project for Nevada County.

I urge you to vote NO on this project.

Thank you.

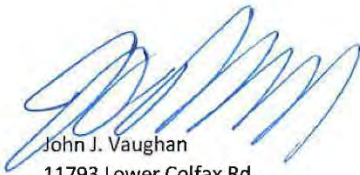
<sup>[7]</sup> While PRIDE’s facility was considered too small we were awarded the HP contract, and kept it for years, because of HP’s commitment to PRIDE’s mission to create jobs for people with disabilities.

<sup>[8]</sup> There is already a custom milling operation at 11429 East Bennett Rd - Freds Custom Milling and Lumber

<sup>[9]</sup> [www.cleanairtrust.org/trucks.dirtytruth.html](http://www.cleanairtrust.org/trucks.dirtytruth.html)

<sup>[10]</sup> DEIR pages 6-12/13





John J. Vaughan  
11793 Lower Colfax Rd  
Grass Valley, CA 95945  
District III Voter  
916-807-0430 Cell  
jvaughan1946@gmail.com  
CC: Matt Kelley, Senior Planner



## **INDIVIDUAL LETTER 394: JOHN VAUGHAN**

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### **Response to Comment Ind 394-1**

This letter is a duplicate copy of Individual Letter 388. Please see comments and responses in Individual Letter 388.





**Individual Letter 395**

Dist 1

RECEIVED

Nevada County Board of Supervisors  
950 Majdu Avenue, Suite 200  
Nevada City, CA, 95959

MAR 21 2022

Date: 03/09/2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

Ind 395-1

Volz Brothers is a family owned company that has been in business in Nevada County since 1982. We are located less than ½ mile from the Centennial Site where much of the post excavation fill dirt will be deposited. Our business, including our customers and employees will be negatively impacted by the more than 200 diesel truck trips between the mine and the Centennial Site.

I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I urge you to vote NO on the project.

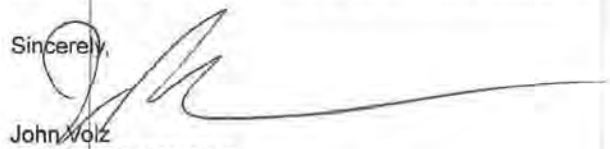
Rise Gold fails to adequately mitigate many significant negative impacts of this large industrial project on our community and business.

Ind 395-2

My business and personal opposition to this project is based on published Rise Gold plans, reports and the DEIR (Draft Environmental Impact Report). Reports from experts show there will be significant increases in air pollution, traffic in key areas (including on Idaho Maryland Rd, very near the Volz Brothers location), noise from both above and below ground operations, wildfire evacuation blockages, reduction of our community's water resources and more. They also report that any economic gains do not justify the costs to the County. Adding 312 jobs, approximately 220 from local hiring, to the County workforce of approximately 44,000 is trivial no matter what the wages, and the higher paying jobs are unlikely to go to County residents.

Ind 395-3

Sincerely,



John Volz  
Volz Bros. Automotive  
962 Golden Gate Terrace, Grass Valley  
530-273-3979

Cc: Nevada County Planning Commission (Suite 170)



## **INDIVIDUAL LETTER 395: JOHN VOLZ**

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### **Response to Comment Ind 395-1**

Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 395-2**

In addition, please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 395-3**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 396**

Nevada County Board of Supervisors  
950 Maidu Avenue, Suite 200  
Nevada City, CA, 95959

Date: 03/09/2022

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

**Ind 396-1**

Volz Brothers is a family owned company that has been in business in Nevada County since 1982. We are located less than ½ mile from the Centennial Site where much of the post excavation fill dirt will be deposited. Our business, including our customers and employees will be negatively impacted by the more than 200 diesel truck trips between the mine and the Centennial Site.

I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I urge you to vote NO on the project.


Rise Gold fails to adequately mitigate many significant negative impacts of this large industrial project on our community and business.

**Ind 396-2**

My business and personal opposition to this project is based on published Rise Gold plans, reports and the DEIR (Draft Environmental Impact Report). Reports from experts show there will be significant increases in air pollution, traffic in key areas (including on Idaho Maryland Rd, very near the Volz Brothers location), noise from both above and below ground operations, wildfire evacuation blockages, reduction of our community's water resources and more. They also report that any economic gains do not justify the costs to the County. Adding 312 jobs, approximately 220 from local hiring, to the County workforce of approximately 44,000 is trivial no matter what the wages, and the higher paying jobs are unlikely to go to County residents.

**Ind 396-3**

Sincerely,

  
John Volz  
Volz Bros. Automotive  
962 Golden Gate Terrace, Grass Valley  
530-273-3979



Cc: Nevada County Planning Commission (Suite 170)



## **INDIVIDUAL LETTER 396: JOHN VOLZ**

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### **Response to Comment Ind 396-1**

Please see Response to Comment Ind 395-1.

### **Response to Comment Ind 396-2**

Please see Response to Comment Ind 395-2.

### **Response to Comment Ind 396-3**

Please see Response to Comment Ind 395-3.



**Individual Letter 397**

Dist 1

**RECEIVED**

FEB 22 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Dear Nevada County Supervisors;

Ind 397-1

Businesses, homeowners, and conservationists in Nevada County are joining together to protect our neighborhoods, our local economy, and our quality of life from the Rise Gold proposal to re-open the Idaho-Maryland Mine. We, urge the Board of Supervisors to reject this destructive proposal and instead protect our community.

We face new environmental challenges and this project seems to be a step in the wrong direction. Our duty is to protect our land and natural resources and not exploit them to their limit. As a father I urge you to think about what world we want for our next generations and encourage you to look at our past and at the past of this Rise Gold. This is not what we want for our community.

In gratitude for your service,

Jon Benner





## **INDIVIDUAL LETTER 397: JON BENNER**

---

### **Response to Comment Ind 397-1**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 398**

**From:** Jonas Ketterle <jonas.ketterle@gmail.com>  
**Sent:** Monday, April 4, 2022 3:45 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** DEIR Comment Submission - Concerned About Dewatering Impact on Water Quality

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Dear Board of Supervisors,

Ind 398-1

Thank you for considering my comment. I am a 36 year old home owner in Grass Valley, and intend to raise my family in the area. My property is on the South Fork of Wolf Creek, and I am very concerned about the water quality impacts of the proposed mine. Our property is adjacent to a historic lumber damn, that is now largely sedimented and has created extensive marshland behind it. The wildlife I've observed from our home in Wolf Creek includes top of the food chain species like otter, beaver, heron, osprey, as well as many other species of waterfowl, fish, and amphibians. I'm VERY concerned that the dewatering that is necessary for mine re-opening will adversely affect this complex ecosystem, especially in a time that ecosystems in California are already under incredible duress due to climate change. Furthermore, my house's water supply comes from a shallow well that is on the banks of the South Fork of Wolf Creek, and I am concerned that the mine dewatering will have an impact on my household's water quality. The lack of sufficient analysis in the DEIR of impact on the water quality of South Fork Wolf Creek has me very concerned that the well for my house will no longer be suitable for domestic use.

Ind 398-2

The DEIR fails to adequately address biological and aquatic resources and hydrological impacts to those resources. The DEIR's biological surveys exclude an entire reach of South Fork Wolf Creek (SFWC) which is where my home is located. Species of special concern are inadequately considered and qualitative data for benthic macro- invertebrates (BMI) is missing. (Wolf Creek Community Alliance (WCCA), Benthic Macroinvertebrate Analysis, 2007) Aquatic resources are excluded through an inaccurate hydrological assessment of the full length of SFWC ignoring the connectivity of the creek upstream and downstream of the culvert on the Mine property thus failing to consider the movement of trout and other aquatic species.



Ind 398-3

Hydrological impacts due to mine dewatering into SFWC are inadequately studied mischaracterized or not considered. The initial dewatering rate of 2500 gallons per minute (gpm) would be followed by 80 years of subsequent operational dewatering at 850 gpm and as much as 2500 gpm. The DEIR fails to adequately consider this long-term higher rate of discharge. Nor does the DEIR consider the seasonality of stream flow loss of streambed or streambank habitat changes in temperature differences in Specific Conductance (EC) and habitat for BMI. Drawdown of the water table due to dewatering is also underestimated and its impacts to meadow wetland and forest habitats are not considered. Further the DEIR fails to consider chronic and cumulative impacts to BMI trout and other aquatic species including special concern amphibians. (WCCA) Overall because the DEIR does not adequately address biological and aquatic resources or sufficiently analyze hydrological impacts this document must be revised.

Ind 398-4

Again, thank you for your consideration of my comment. I've focused my comment submission on this particular aspect of the DEIR, but there are many other aspects of the mine proposal that have me very concerned. Please diligently consider all the other comments received from our community as to whether or not this mine will truly be beneficial for our town and bio-region.

Kindly,  
Jonas



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## **INDIVIDUAL LETTER 398: JONAS KETTERLE**

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### **Response to Comment Ind 398-1**

The commenter resides near South Fork Wolf Creek and is concerned with impacts from the discharge of treated water to South Fork Wolf Creek and any adverse impacts to the private well that serves the property. The DEIR discusses the impacts to South Fork Wolf Creek in Chapter 4.8 and found that impacts would be less than significant after mitigation, both with regard to water quality standards (DEIR, p. 4.8-41) and groundwater supplies (DEIR, p. 4.8-54.) For other impacts related to South Fork Wolf Creek, the commenter is referred to Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependent Vegetation, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 36 - Flows in South Fork Wolf Creek, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 - Drought and Climate Change, Master Response 30 - Biological Study Technical Adequacy, Master Response 34 - Resident Fish, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

### **Response to Comment Ind 398-2**

The commenter states that the DEIR is inadequate because it does not include a biological survey of the entire reach of South Fork Wolf Creek and does not discuss biological, aquatic, or hydrological impacts to South Fork Wolf Creek. The offsite stream reach referenced by the commenter is outside the project site and will not be subject to project-related surface disturbance. However, potential downstream effects of the project were evaluated in the DEIR. Please see Master Response 36 - Flows in South Fork Wolf Creek, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 34 - Resident Fish, Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependant Vegetation, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog. The commenter is also referred to Response to Comment Grp 31-12 regarding BMI.

### **Response to Comment Ind 398-3**

The commenter reiterates concerns with hydrological and biological impacts to South Fork Wolf Creek. The commenter also states that the DEIR inadequately discusses the variable rate of flow from the dewatering of the Idaho-Maryland Mine. The commenter is referred to Response to Comment Ind 398-1. Regarding the rate of flow, the analysis of project impacts considers the higher rate of flow of 2,500 gallons per minute. The commenter is referred to Chapter 4.8, Appendices K.1, K.2, and K.3 of the DEIR. Regarding the Specific Conductance and BMI, the commenter is referred to Response to Comment Grp 31-12.

### **Response to Comment Ind 398-4**

The commenter is concerned about various other aspects of the DEIR but provides no specific comments on the adequacy of the DEIR. The comment is noted and has been forwarded to the decisionmakers.





Individual Letter 399

3/24/22, 8:13 AM

JBK Comment to Planning Commission 3/24/2022 - Google Docs



JBK Comment to Planning Commission 3/24/2022

Good morning Commissioners; thank you for this opportunity.

My name is Jonathan Keehn. My wife and I live in District 3, just outside the GV city limits, and also own two other properties in GV proper. I also own a house in District 4, near North Columbia. Our place there is on property adjacent to the now-defunct Siskon Gold Mine. (more?)

I've lived and worked in Nevada County since 1970. I am licensed General Contractor, and owner of Keehn Construction, in business for close to 50 years. In 2003 I was one of the founders of the Wolf Creek Community Alliance, and currently serve as President. The mission of our organization includes "to preserve, protect, and restore Wolf Creek and its watershed."

In getting ready to address you this morning, I looked at the Staff Report you have before you. On page 2, about ¾ of the way down, a sentence jumped out at me. "A new above ground pipe would convey treated water from the water treatment plant along an existing dirt road to the planned discharge point at South Fork Wolf Creek." This is an important pipe for the proposed project, as I'm sure you are aware. But it is not the pipe I want to bring to your attention - it's the wording: "existing dirt road". It is not a road, it's a path.

Ind 399-1

I know this area pretty well - our organization has monitoring sites just upstream and downstream. For years before RISE bought the property and put up No Trespassing signs, lots of neighbors and creek lovers enjoyed walking and bird-watching on the informal trails. There are a ton of native California plants: trillium, equisetum, and surprising orchid called rattlesnake plantain. Maps in the DEIR show a dotted line for the proposed pipeline, but there is no "existing dirt road" there. It is a meandering path; it may have been used for logging 50 years ago, but not a road. One has to step over fallen trees, dodge poison oak, and jump over streams in the rainy season.

At least that's the way it was last time I was there 3 or 4 years ago. I don't know if the applicant has recently built a road there - I'd have to check with the planning department to see if permits exist.

So why does the DEIR (and your staff report) call it an "existing dirt road"? Whoever wrote those words apparently wanted it to sound like "no big deal, this area is already degraded, just fine for a pipeline". It may be a small detail, but it is indicative of many passages in the DEIR that minimize or ignore the existing habitats, to say, "we're only going to make it a little bit worse".

My comment this morning: "the DEIR must be revised to accurately describe the proposed pipeline route as it really is; not "an existing dirt road", but a lovely path along the creek."

Thank you for your time.





## **INDIVIDUAL LETTER 399: JONATHAN KEEHN**

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### **Response to Comment Ind 399-1**

The commenter questions whether the pathway for the new above ground pipe that would convey treated water from the treatment plant to its discharge point at South Fork Wolf Creek is accurately characterized as “an existing dirt road.” The commenter incorrectly states this is a “path along the creek” and it should be noted this is private property and not a public path or trail. Irrespective of the terminology used to characterize this area of the site, the DEIR analyzed potential impacts associated with disturbance related to installation of the treated water pipeline along this pathway. DEIR section 4.4.4 analyzed potential biological impacts associated with project-related surface disturbance, including installation of the aboveground pipe. Mitigation measures require preconstruction surveys prior to surface disturbance to limit potential impacts to rare plants, special status wildlife species, and protected birds and raptors (see Mitigation Measures 4.4-1(b) and 4.4-2(a-g).)



**Individual Letter 400**

3/24/2022

Nevada County Planning Department  
950 Maidu Avenue, Nevada City,  
CA 95959

225 south auburn street  
Grass Valley, CA  
95945



Dear Matt Kelley,

**Ind 400-1**

We should not reopen the Idaho Maryland mine and here is why. Did you know the metal mining industry reported 2.8 billion pounds of toxins admitted to our air, water, and wildlife, now let that sink in?" In 2012, 340 migrating geese were found dead in the abandoned Berkeley pit copper mine in Butte Montana. "Fish in a 15 mile stretch of the Alamosa river were found dead in Colorado and were killed by a spillage in Summitville mine, near Leadville." Did you know Some of the most acidic water ever recorded in the Richmond Mine in California? The water was more acidic than battery acid and was known to catch on fire. I believe we should not reopen the Idaho Maryland mine because it is bad for our air, water, and wildlife. (WMAN)

**Ind 400-2**

Imagine how bad our air quality is during the fire season with all of the smoke, now imagine how much worse it would be with the mine, people would not be able to live here. "Hundreds of tons of rock are unearthed, moved, and crushed in mining operations significantly increasing the amount of dust and particulates in the air." In addition, mine tailings, which may contain finely ground and even toxic waste, can become airborne." This air pollution can directly affect human health. Tailing from uranium mines on Navajo Reservations lands in Arizona has contributed to health problems experienced by local residents. "In a 1998 case study, EPA documented dozens of toxic releases from mines and processing facilities in Arizona, New Mexico, and Nevada. Eight out of 12 major mines in Montana have major water quality problems that were not predicted by federal agencies at the time of permitting."

**Ind 400-3**

You need water to survive right? So how would you feel if one of the things you needed to survive was contaminated, well I know that I wouldn't like that? More than 40% of stream reaches in western watersheds are contaminated by acid mine drainage and heavy metals now that is a lot. In Nevada, the driest state in the U.S, the Humboldt River is being drained to benefit gold mining operations along with the Carlin Trend, all of this just for gold. Mines in the northeastern Nevada desert have pumped out more than 580 billion gallons of water since 1986—enough to feed New York City's taps for over a year. Hundreds of migratory birds have been poisoned after landing at mine pit lakes in California and Nevada, according to the WMAN Environmental impactite of mines. Acid mine drainage can be 20 to 300 times more acidic than acid rain and can burn human skin and kill fish and aquatic organisms. An EPA inspection



↑  
between 1990 and 1995 of some U.S. mines and processing facilities found that about 20 percent were polluting air or water in violation of federal environmental laws, according to the WMAN Environmental impactite of mines.

The death rate from the serious disease has been very high in the Clark Fork Basin near Butte, Montana, and areas of intensive mining and smelting for over a hundred years. “The Clark Fork Basin contains the most extensive area of Superfund sites in the United States.” National cancer statistics also have shown elevated death rates from cancer—particularly lung, bronchial, and trachea cancer—in areas of the Clark Fork Basin where mining has occurred. And losing many people do to cancer I don’t want more people to lose people do to it. “Cancer mortality rates in these areas have been much higher than in other areas in Montana and neighboring states where mining activity has not occurred. Spills and drainage for the defunct Richmond Mine have killed fish and plants along miles of the Sacramento River, which provides drinking water for 80,000 residents of Redding, California. We need these things to survive so why are we just getting rid of them. Mining also can cause erosion and sedimentation, burying gravel beds important for salmon spawning and damaging habitat for trout and other species that depend on clear, cold, oxygen-rich water for example that is like taking away all of are clear water and replacing it with dirty water, oh wait that exactly what they are doing.”

**Ind 400-4**

Sincerely,

*Jonathan Nolan*

Jonathan Nolan



## **INDIVIDUAL LETTER 400: JONATHAN NOLAN**

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### **Response to Comment Ind 400-1**

Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 400-2**

Please see Master Responses 18 through 23 regarding air quality. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 400-3**

Please see Master Responses 30, and 33 through 35 regarding water quality. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 400-4**

Please see Master Responses 34 and 35, as well as Response to Comment Ind 400-3. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.





**Individual Letter 401**

February 18, 2022

Dear Nevada County Board of Supervisors:

I OPPOSE the Idaho-Maryland Gold Mine being reopened by Rise Mining Company.

**Ind 401-1**

As a registered voter in Nevada County and a homeowner in Cedar Ridge, I am deeply concerned about the proposed possibility of reopening the Idaho-Maryland Mine in my backyard and underneath my feet.

I have downloaded and reviewed the EIR report.

Here are the reasons why I oppose reopening the Idaho-Maryland Mine:

**MINE WASTE and WATER POLLUTION**

**Ind 401-2**

Gold mining produces huge amounts of mining waste, some of which contain heavy metals and other toxic substances. Both waste rock and tailings threaten to pollute groundwater and surface water. Our community is still dealing with arsenic and the leaching of heavy metals from the Gold-Era days. And now, Rise, a Canadian company comes along and wants to produce even more mine waste for 80 years: 182,500 tons per year! More tailings that polluting big rig trucks will need to haul away with the potential for leaching more arsenic into our waterways for generations to come.

**INCREASE GREENHOUSE GAS EMISSIONS**

**Ind 401-3**

Haul trucks, up to 100 round trips PER DAY will be needed to transport this mine waste, significantly increasing the amount of air pollution and greenhouse gas emissions into our community's air.

**TRAFFIC AND SAFETY**

**Ind 401-4**

The increase of vehicles, specifically 20 ton haul trucks, up to 100 round trips per day on Brunswick Road and the Cedar Ridge Y (Brunswick Road and Highway 174) intersection will be significant and unavoidable! This is according to the EIR report. Are the supervisors aware that the Union Hill School District, with over 800 students and staff, are within the boundaries of these dangerous roads and intersections? The same intersection and roads that school buses and parents use to transport students to school five days a week, twice a day. The same roadways that the EIR report states will be significant and unavoidable even after implementation of feasible measures. Reopening the Mine will threaten the safety of our children, their parents, and the over 100 school staff members from the nearby Union Hill School.

Is the pursuit of gold really worth so much environmental destruction AND the real potential for significant and unavoidable auto accidents between 20 ton trucks and children in cars/buses?

I think not. Vote NO to Rise Mining Company.

**Ind 401-5**

Sincerely,



Jorge Velasquez,

mailing address: P.O. Box 1812, Cedar Ridge, CA 95924

physical address: 11073 Cedar Ridge Dr., Grass Valley, CA 95945





## **INDIVIDUAL LETTER 401: JORGE VELASQUEZ**

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### **Response to Comment Ind 401-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 401-2**

Please see Master Responses 8 through 12 regarding mine waste and Master Response 35 regarding water quality in South Fork Wolf Creek. In addition, the DEIR evaluates the proposed project's potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, including as part of construction and mine dewatering, under Impact 4.8-1, starting on page 4.8-41. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 401-3**

Please see Master Responses 18 through 23 regarding air quality and Master Responses 25 through 28 on greenhouse gases and climate change, as well as the discussions and analyses in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 401-4**

The commenter reiterates the significant and unavoidable conclusion in the DEIR. Because significant and unavoidable impacts have been identified in the DEIR, for which feasible mitigation measures cannot reduce the potential impact to a less-than-significant level, the County, should it decide to approve the proposed project, would be required to adopt a Statement of Overriding Considerations.

### **Response to Comment Ind 401-5**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 402**

February 15, 2022

Dear Nevada County Board of Supervisors,

I OPPOSE the Idaho-Maryland Gold Mine being reopened by Rise Mining Company

**Ind 402-1**

As a registered voter in Nevada County and a homeowner in Cedar Ridge, I am deeply concerned about the proposed possibility of reopening the Idaho-Maryland Mine in my backyard and underneath my feet.

I have downloaded and reviewed the EIR report.

Here are the reasons why I oppose reopening the Idaho-Maryland Mine:

**Ind 402-2**

**MINE WASTE and WATER POLLUTION**

Gold mining produces huge amounts of mining waste, some of which contain heavy metals and other toxic substances. Both waste rock and tailings threaten to pollute groundwater and surface water. Our community is still dealing with arsenic and the leaching of heavy metals from the Gold-Era days. And now, Rise, a Canadian company comes along and wants to produce even more mine waste for 80 years: 182,500 tons per year! More tailings that polluting big rig trucks will need to haul away with the potential for leaching more arsenic into our waterways for generations to come.

**Ind 402-3**

**INCREASE GREENHOUSE GAS EMISSIONS**

Haul trucks, up to 100 round trips PER DAY will be needed to transport this mine waste, significantly increasing the amount of air pollution and greenhouse gas emissions into our community's air.

**Ind 402-4**

**TRAFFIC AND SAFETY**

The increase of vehicles, specifically 20 ton haul trucks, up to 100 round trips per day on Brunswick Road and the Cedar Ridge Y (Brunswick Road and Highway 174) intersection will be significant and unavoidable! This is according to the EIR report. Are the supervisors aware that the Union Hill School District, with over 800 students and staff, are within the boundaries of these dangerous roads and intersections? The same intersection and roads that school buses and parents use to transport students to school five days a week, twice a day. The same roadways that the EIR report states will be significant and unavoidable even after implementation of feasible measures. Reopening the Mine will threaten the safety of our children, their parents, and the over 100 school staff members from the nearby Union Hill School.

**Ind 402-5**

Is the pursuit of gold really worth so much environmental destruction AND the real potential for significant and unavoidable auto accidents between 20 ton trucks and children in cars/buses?

I think not. Vote NO to Rise Mining Company.

Sincerely,

Jorge Velasquez  
mailing address: P.O. Box 1812, Cedar Ridge, CA 95924  
physical address: 11073 Cedar Ridge Dr., Grass Valley, CA 95945



## **INDIVIDUAL LETTER 402: JORGE VELASQUEZ**

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### **Response to Comment Ind 402-1**

Please see Response to Comment Ind 401-1.

### **Response to Comment Ind 402-2**

Please see Response to Comment Ind 401-2.

### **Response to Comment Ind 402-3**

Please see Response to Comment Ind 401-3.

### **Response to Comment Ind 402-4**

Please see Response to Comment Ind 401-4.

### **Response to Comment Ind 402-5**

Please see Response to Comment Ind 401-5.



**Individual Letter 403**

February 14, 2022

Attention: Matt Kelley  
Senior Planner, Nevada County Planning Department  
950 Maidu Avenue Suite 170  
Nevada City, CA 95959-7902

**Ind 403-1**

Thank you for this opportunity to review and comment on the, *Idaho-MaryLand Mine Project SCH # 2020070378 Draft Environmental Impact Report December 2021 Prepared By: Raney Planning & Management, INC. for the proposed Idaho-Maryland Mine.*

Having reviewed the proposed project's Draft EIR I agree with, Alternative 1: No Project (No Build) Alternative (Section 2.4 Summary of Project Alternatives).

My main concern for such a project is potential adverse effects to groundwater within the Wolf Creek watershed. I own property within the Greenhorn Creek watershed and rely on a groundwater well. Having lived most of my life using well water, I understand the need for conserving your groundwater, especially in years of drought.

**Ind 403-2**

I have other concerns, though my agreement is with Alternative 1.

 2/14/2022

Joseph D. Riley  
Nevada County Resident



## **INDIVIDUAL LETTER 403: JOSEPH RILEY**

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### **Response to Comment Ind 403-1**

The comment notes preference for Alternative 1 – No Project (No Build). The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 403-2**

Please see Master Responses 13 through 16. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.





**Individual Letter 404**

**From:** Joshua Fisher <joshua@thefuturegods.com>  
**Sent:** Monday, April 4, 2022 3:17 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** Comments on the Draft EIR for the Idaho-Maryland Mine Project

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Hello Matt,

I wanted to voice my concerns about the possibility of the mine reopening.

**Ind 404-1**

I am a newer resident of Nevada City, my girlfriend and I moved up here from Los Angeles in September, mainly to be surrounded by the nature, cleaner air & water and just a slower pace of life. We love to so far!

I am not going to pretend to be an expert on mines because I am not. I am political junky and know a good deal about history and with that comes the some knowledge of mines and the harm they can bring to their surrounding environments. With that said, I like to read and I have looked into a lot of the consultant letters and reports and I think this mine project has the ability to harm many of the reasons we intended to move up here in the first place — This is coming from a new resident. We have some neighbors who have been here for generations and they concerns carry more weight.

**Ind 404-2**

Some of the issues I have are

**Ind 404-3**

- Mine waste — a lot of the experts say Asbestos will be. Huge problem and there would need to be a way larger effort than described in the report. There is no denying there will be Asbestos, so in my opinion, why even mess with something so toxic.
- I'm worried about all the toxins that can get into our drinking water
- Noise, traffic, air quality — All the reasons I moved to a place like Nevada City and all the things this projects would bring.

**Ind 404-4**

**Ind 404-5**

These are just a few of the many concerns I have and have been raised by the community. I hope you take it all into consideration. I know there is a lot of money behind the project, but the people of this community don't want this project moving forward!

Joshua  
—  
Future Gods  
[www.thefuturegods.com](http://www.thefuturegods.com)



## **INDIVIDUAL LETTER 404: JOSHUA FISHER**

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### **Response to Comment Ind 404-1**

The comment alludes to concerns expressed in subsequent comments. Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 404-2**

Please see Master Responses 8 through 10 regarding mine waste and Master Responses 22 and 23 regarding asbestos. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 404-3**

Please see Master Response 35. In addition, the DEIR evaluates the proposed project's potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, including as part of construction and mine dewatering, under Impact 4.8-1, starting on page 4.8-41. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 404-4**

Please see Master Response 1. The commenter expresses general concerns regarding noise, traffic, and air quality but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 404-5**

Please see Master Response 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 405

Dist 1

Ind  
405-1

**I support re-opening the Idaho-Maryland Mine**

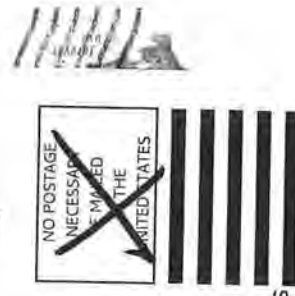
Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Don't sell out our RECEIVED  
Address COMMUNITY! FEB 18 2022

Phone \_\_\_\_\_ NEVADA COUNTY  
Email Address \_\_\_\_\_ BOARD OF SUPERVISORS



NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

RISE GRASS VALLEY  
POSTAGE WILL BE PAID BY ADDRESSEE

**Don't  
Give  
them a permit!**

RISE GRASS VALLEY INC  
PO BOX 271  
GRASS VALLEY CA 95945-9801

NEVADA COUNTY  
BOARD OF SUPERVISORS  
PERMIT NO. 28  
GRASS VALLEY, CA

FEB 18 2022



Ms. Joy Waite  
12504 Old Stagescoach Rd  
Grass Valley, CA 95945-9606

RECEIVED  
FEB 18 2022  
NEVADA COUNTY  
BOARD OF SUPERVISORS



## **INDIVIDUAL LETTER 405: JOY WAITE**

---

### **Response to Comment Ind 405-1**

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





Individual Letter 406

Matt Kelly  
Senior Planner  
Nevada County

Comments on the Rise Gold DEIR.

Ind 406-1

I am concentrating on water concerns although there are many other of the at least 83 "issues that cannot be mitigated" that concern me.

Concerns about water fall into several categories:

Water follows the path of least resistance. The miles of mine shafts holding incalculable volumes of water has a (DEIR) reported static level at 260 feet below the surface. This volume of water is significant as an underground reservoir. Pumping this water out creates an open space that serves as a path of least resistance. Rise Gold is proposing that the mine would continue to be pumped out for 80 years. Even if we had no concerns about drought, knowing that water was being pumped out of Nevada County at 2500 gallons per minute per the DEIR flies in the face of residents already being periodically asked to reduce water use.

Ind 406-2

Related to the above is the water security of neighboring home owners. The DEIR admits the relationship between emptying the mine of water and the failure of local wells. The area the DEIR suggests that NID provide a water supply to is minimal (30 homes along East Bennett St). Well failure could be much more widespread (some suggesting 595 or more wells) When Engold took us through this process (hasn't our community gone through this same process enough times???), residents as far away as Banner Mountain expressed concern about the viability of their wells. The precautionary principle would put the **onus on Rise Gold** to prove that the evacuation of water from the mine did not cause these failures.

Ind 406-3

The DEIR claims that the water in the mine is clean and qualifies for a "Limited Threat permit". High levels of iron and manganese are the only issues noted. The description of a 40 acre foot settling pond and water treatment plant are very sketchy and lack details. The minimal information provided leaves more questions than answers. This shows that very little effort and thought has been put into this important issue. All we read about the water treatment plant is that there will be one. Nothing about the design or how it would function is specified. Design and specifications for a water treatment plant must be part of the DEIR. At 2500 gallons per minute, 11.05 acre feet of water would be pumped out per day. A 40 acre foot settling pond would reach capacity in less than 4 days. That volume of water negates its use as a settling pond.

Ind 406-4

The DEIR includes a section on Stormwater detention ponds. There is no plan mentioned for treating the water in these detention ponds despite the volumes of tailings that will be produced and stored on the surface. What about the quality of water being pumped out of the mine after tailings are used underground for "backfill"? In addition to water security, our local geology of fractured rock makes the path of water largely a guessing game, how about probable contamination of wells due to mining activity?

Ind 406-5

The DEIR indicates that an on site septic field system would contain waste water from toilets, sinks, showers, etc. Again, water follows the path of least resistance. How will this water be





- ↑
- Ind 406-6** kept out of the mine? Specifications on proposed septic systems need to be included in the DEIR.
- NID is being asked to provide 5700 gallons per day of potable water, and an undetermined amount of water for myriad other uses such as dust control. One number offered is 42,000 gallons per day from NID. The DEIR admits squandering a current water supply (de watering) and then also sucking up a significant amount of already limited local water.
- Ind 406-7** Our community's water security is of utmost importance and cannot be compromised by dirty extractive industrial operations. History has proven that the wealth of communities has been taken and a mess left behind. The term coined is "toxic mining legacy" here in Nevada County. **We can't afford one day of mine reopening** let alone 80 years and the DEIR suggests further industrial uses after that. Reclamation according to the DEIR is seeding the surface tailings. There is no requirement that the seeds be able to grow. The mine closed in the 1950's and the site is still contaminated. Those who do not learn from history end up repeating it. Haven't neighbor complaints since Rise Gold has been doing "exploration" been proof enough of the devastation that would be wrought by full mining operations?? Please don't open the door to this destructive exploitation of our beautiful community. How easily the incredible arts and culture so cultivated and prized here, and the lovely foothills environment we love could be wrecked...
- Joy Waite  
Grass Valley



## **INDIVIDUAL LETTER 406: JOY WAITE**

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### **Response to Comment Ind 406-1**

The DEIR estimates that there is approximately 1,183 acre-feet of water in the underground mine workings. (DEIR, p. 4.8-12.) The DEIR concludes that the dewatering of the mine would result in less than significant impacts after mitigation to groundwater supplies. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 406-2**

The commenter states that the DEIR underestimates the number of private wells potentially impacted by the project, but does not explain how the DEIR is inadequate in this regard. The DEIR concludes that the dewatering of the mine would result in a less than significant impact after mitigation to groundwater supplies. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 7 - Location of Future Mining Areas, Master Response 13 - Historic Hydrogeologic Assessments, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

### **Response to Comment Ind 406-3**

The commenter states that the DEIR lacks adequate detail with regard to the settling pond and on-site water treatment plant and that the mine contains contaminants. A sufficient description of the proposed water treatment plant is included in Chapter 4.8, Hydrology and Water Quality, of the DEIR (DEIR, pg. 4.8-43). A detailed description of the water treatment plant is provided in Appendix K.4 of the DEIR (Water Treatment Plant Design Report). The mine water discharge is required to meet water quality goals including total suspended solids. The commenter is also referred to Master Response 35 - Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 406-4**

One of the commenter's primary concerns appears to be with the potential for stormwater quality to be impacted by above-ground tailings. The applicant will need to obtain several approvals from the Central Valley Regional Water Quality Control Board (RWQCB), which will require further testing of the rock at the project site. As described in the April 4, 2022 comment letter from the RWQCB (Agency Letter 5 of this Final EIR), additional laboratory studies will be required to characterize the waste materials as part of a Report of Waste Discharge. The RWQCB cannot issue permits for the placement of engineered fill unless the testing that is part of the Report of Waste Discharge clearly demonstrates that use of the barren rock for engineered fill will not violate water quality standards or conflict with the Water Quality Control Plan. The barren rock testing that was conducted in support of the project application and used in the DEIR provides evidence of the potential water quality effects that might occur due to the use barren rock as engineered fill, while the RWQCB permits, which are a requirement of the project because mining cannot occur until such permits are issued, ensure that water quality standards will be met. Please see Master Response 8 – Mine Waste Characterization.



Another primary concern of the commenter appears to be the potential for backfill placed in the mine to contaminate groundwater being pumped from the mine. Regarding cement paste backfill, the DEIR imposes mitigation measures that require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Quality Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d)). The CVRWQCB requires additional waste characterization as part of approving WDRs and also requires ongoing water quality monitoring during the implementation of WDRs to ensure that no water quality impacts will occur.

In regard to fractured rock, the commenter is referred to Master Response 14 - Adequacy of Groundwater Model.

#### **Response to Comment Ind 406-5**

The commenter asks how water from the on-site septic system would be contained and states that the DEIR lacks this information. Water from the leach field proposed for the project does not drain into the underground mine. Appendix H.8 of the DEIR provides a septic system analysis. As stated on page 4.11-34 of the DEIR, a relatively large, acceptably permeable soil area has been identified within the proposed leach field area, just south of the proposed engineered fill footprint, and set back 100 feet from the property line. The evaluation concludes that the project site is suited for a Pressure Dose sewage disposal system with a minimum of 1,935 lineal feet of leach line. A minimum 10,000-gallon septic pump tank with watertight risers over each lid and an outlet effluent filter would be required. The pump tank would be oversized in order to accommodate for potential power loss, backups, and surge flows in the future.

#### **Response to Comment Ind 406-6**

The commenter states that the dewatering of the mine is wasteful but does not state how the DEIR is inadequate. By increasing flows to South Fork Wolf Creek, the project would produce a surplus of water. The commenter is referred to Chapter 4.8 and Appendix N of the DEIR and Master Response 16 - Drought and Climate Change.

#### **Response to Comment Ind 406-7**

The commenter summarizes their opposition due to a variety of perceived impacts. The commenter's opposition to the project is noted for decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.



**Individual Letter 407**

**From:** [Joyce Hoffman](#)  
**To:** [Idaho MMEIR](#)  
**Subject:** Against Rise Mine, a new issue  
**Date:** Friday, April 1, 2022 11:32:33 AM

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April 1, 2022

To Matt Kelley, Nevada County Planner

This letter is to bring up another concern I have over the potential Rise Mine project. I am against the mine for all the reasons that have already been mentioned in the paper and at the meetings. But another concern is over wildfires. Last year, we had a terrible scare when part of their property was on fire. It was very close to town and many businesses as well as neighborhoods were on alert.

My question is, why hasn't the county or the city of Grass Valley asked the owners of Rise's properties to clear out dry, damaged, or congested vegetation and create a fire break between their property and the surrounding properties?

Please include this issue and address it in response to the community's objections to the Rise endeavor.

Thank you.

Joyce Hoffman, Ph.D.  
266 North Auburn Street  
Grass Valley, CA 95945

Ind 407-1



## **INDIVIDUAL LETTER 407: JOYCE HOFFMAN**

---

### **Response to Comment Ind 407-1**

Please see Master Response 6 – Wildfire Impacts. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.





**Individual Letter 408**

April 4, 2022

Matt Kelly, Senior Planner  
Nevada County Planning Department  
Idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelly,

Thank you and the Planning Department for your dedication to hearing from the general public about the potential of bringing industrial mining back to Nevada County. I am among those in strong opposition to the plan proposed by Ben Mossman and the company he represents, Rise Gold.

The EIR Noise Report does not address the real impact of living next to an Industrial Mining Operation. Last summer when Rise Gold was doing test drilling the vibrations from the drilling could be felt coming up through our floor boards. The EIR downplays the noise coming from blasting and drilling underground as nonexistent when we in fact know from experience this is not the case. . Running a crushing machine 24/7 inside a building is going to emit a great deal of noise. Again the EIR downplays this as modern mining techniques. The trucks running from 8am to 10 pm will greatly impact our quiet country lifestyle. The EIR says this will be no more than regular traffic noise. WE know in fact that every dump truck backing up emits a warning siren that will carry up through our forest and greatly impact our lives.

We are asking for a more in depth study on the noise potential for the mine. Sleep is an important factor in the health and welfare of our community. Our property is within a quarter mile of the mine site.

Sincerely,

Jude Bischoff  
Residence Address:  
11010 Brunswick Dr.  
Grass Valley, CA 95945

Mailing Address:  
PO Box 1202  
Cedar Ridge, CA 95924

**Ind 408-1**



## **INDIVIDUAL LETTER 408: JUDE BISCHOFF**

---

### **Response to Comment Ind 408-1**

Please see Master Responses 1 and 2.

The analysis of potential noise and vibration impacts can be found in Chapter 4.10, Noise and Vibration, of the DEIR. Mitigation Measures 4.10-1 through 4.10-4 have been incorporated into the project to reduce the severity level of potential impacts that would otherwise be significant. In the case of Impact 4.10-1, the DEIR discloses that even with incorporation of Mitigation Measure 4.10-1, the impact would remain significant and unavoidable. Thus, the analysis within the DEIR does not downplay the severity of potential impacts that could occur through implementation of the proposed project. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve or deny the project. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 409



FROM:

SACRAMENTO CA 957  
P-3 P67 104  
Judith Bea Brown  
13427 Sunshine Valley Rd  
Grass Valley, CA 95945-9602



Dist 1

THE IDAHO-MARYLAND MINE  
A PROPOSAL

TO

Clerk of the Board,

RECEIVED

FEB 28 2022

950 Maidu Avenue, Ste. 200,  
Nevada City, CA 95959

NEVADA COUNTY BOARD OF SUPERVISORS

per, air  
or from

ley's  
ite

The Idaho-Maryland Mine is the most productive and profitable gold mine in the United States. The mine closed in 1982, producing 2.4 million ounces of gold at \$35 per ounce. The mine is now American gold unprofitable.

hundreds of good-paying jobs and realize broad economic benefits for Nevada County.

Rise Grass Valley will reinstate mining and will do so with a focus on green-friendly practices and minimizing the impacts to neighbors. The project will use modern, clean, state-of-the-art mining equipment and proven techniques to produce "green gold." The result is a project



Please fill out and send back to us your support for the Idaho-Maryland Mine

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit [RiseGrassValley.com/contact](http://RiseGrassValley.com/contact) and sign up.

Name(s) \_\_\_\_\_  
Address \_\_\_\_\_ ZIP \_\_\_\_\_  
Phone \_\_\_\_\_  
Email Address \_\_\_\_\_

Ind  
409-1



## **INDIVIDUAL LETTER 409: JUDITH BROWN**

---

### **Response to Comment Ind 409-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 410**

**From:** Judith Cooper <jcooper45@gv.net>  
**Sent:** Saturday, April 2, 2022 2:07 PM  
**To:** Planning  
**Subject:** Rise Gold & Reopening of Idaho Maryland Mine

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**Ind 410-1**

Dear Planning Commission,  
I've lived in Nevada County for 41 years after 10 years in San Francisco. What a pleasure it's been to live here with so much natural beauty, much less traffic/congestion, noise & pollution.  
I'm horrified that you are considering allowing the reopening of the Idaho Maryland Mine. To do so will increase traffic, noise, air pollution, water pollution, impact local wells, threaten wildlife & change the aesthetics of our beautiful community.

**Ind 410-2**

How much water would the mine use when we're already in severe drought conditions? Last year, NID expected homeowners, like myself, to cut back their water usage by 20%. I've done this & continue to do this. I do not wish to cut back further to accommodate a gold mining project.

**Ind 410-3**

And for what? Jobs? Mining is the lowest job creator in US industry.  
Please, please, please do not approve the mine reopening. You live here, too. Let's enjoy & appreciate our community as it is today.  
All good wishes,  
Judith Cooper  
105 Woodcrest Way  
Grass Valley, CA 95945





## **INDIVIDUAL LETTER 410: JUDITH COOPER**

---

### **Response to Comment Ind 410-1**

Please see Master Response 1. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 410-2**

As detailed on page 3-39 of the DEIR, the Idaho-Maryland Mine would have a surplus of water from the natural groundwater flow into the underground workings. Once dewatering is completed, approximately 1.9 cubic feet per second (cfs), or 850 gallons per minute (gpm) (approximately 1,224,000 gallons per day [gpd]), are estimated to be pumped to the surface and settling pond. Such water would support all project-related water demand (i.e., mining and processing activities), except for water purchased from NID. The process plant would run on a closed circuit. Please also see Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 410-3**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 411

Judith DeVine  
P.O. Box 942  
Cedar Ridge, CA 95924  
April 4, 2022

RECEIVED  
APR 04 2022  
COMMUNITY DEVAGENCY

Mr. Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

Dear Mr. Matt Kelley,

Ind 411-1

This is a passionate plead for you and All involved to vote against the mine - so called Rise Grass Valley. At the DEIR meeting they told many lies. Now they are using photos of children to try to legitimize their covetous spirit and actions. They plan to steal property values and water rights of many people, and fill our air and water with their pollutants and call it good.

Ind 411-2

Their trucks will tear up our roads and carry explosives over already congested roads causing more noise and congestion. And unsightly scenery. They will make it ugly and unfit for humans and animals.

Ind 411-3

They are nothing but thieves and liars, and care nothing about the people living in the area. They only want the gold that they say will make Grass Valley a great place to live. What a joke! Please see through the lies.

Sincerely with Passion,  
Judith DeVine  
P.S. I'm a resident of the area myself, it is personal!



## **INDIVIDUAL LETTER 411: JUDITH DEVINE**

---

### **Response to Comment Ind 411-1**

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 411-2**

Please see Master Response 1, as well as the discussions and analyses in Chapter 4.1, Aesthetics, and Chapter 4.7, Hazards and Hazardous Materials, of the DEIR. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 411-3**

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 412

Matt Kelby  
Nevada Co Planning Dept

4-1-22

To whom it may concern

We object to the proposed Idaho  
Maryland Mine.

Ind 412-1

Concerns about the dewatering of wells  
Large truck traffic  
Blasting  
Noise  
Should not be in a residential area  
air quality

Please vote no!

Judith S. Emmons  
*J S Emmons*

Judith S. EMMONS  
Lawrence D Emmons

856 Morgan Ranch Dr  
Grass Valley CA 95945

530-205-9740



## **INDIVIDUAL LETTER 412: JUDITH AND LAWRENCE EMMONS**

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### **Response to Comment Ind 412-1**

Please see Master Response 1. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.





**Individual Letter 413**

March 26, 2022

Matt Kelly, Senior Planner  
Nevada County Planning Department  
950 Maidu Ave., Suite 170  
Nevada City, CA 95959



RE: Mine Comments / Opposition

Dear Mr. Kelly:

I am a home owner off Greenhorn in Grass Valley. I was a Chiropractor in the Bay Area for 30 years and had a ten year plan to retire and move to the Grass Valley area.

I absolutely love our home, neighborhood and community. I have never in my life felt so much a part of where I live. I thought I would live my golden years here, enjoying the quiet serene mountain life.

If the mine gets approved, all my dreams will be shattered. In fact, I will most likely be forced to move, which breaks my heart.

My biggest opposition to the reopening of the Idaho-Maryland Mine as pertaining to the DEIR as follows:

1. The impact analysis on the wells in the DEIR underestimates potential impacts and has highly inadequate mitigation measures. No impact report can accurately assess the flow of underground water in the midst of a 22 year drought, especially stretched out over 80 years. There needs to be a written solution to remedy any well affected by the mine (contamination or reduced water flow), which could be hundreds.
2. Air Quality impact is inadequate in the DEIR. The air quality in Nevada County is already poorer than I am comfortable with. ANY additional toxic particles reaching our lungs in unacceptable in Grass Valley.
3. Noise and Visual impacts which cannot be mitigated. The natural character of our mountain community should not be subject to buildings of 8-16

Ind 413-1

Ind 413-2

Ind 413-3



stories high! This ignores existing building height limits of 45 feet. I will be forced to look at this unsightly mess every time I drive out.

4. Increased traffic by trucks running morning until night as outlined by the DEIR, cannot be mitigated. The emissions put out by these vehicles is again affecting our air quality and runs counter to our efforts as a community to reduce greenhouse gas emissions.

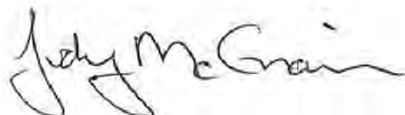
Ind 413-4

**Please Choose No Project, No Build Option**

We in Grass Valley and Nevada City do not define ourselves by having an active mine in 2022. It will hurt tourism, home values and most importantly our quality of life.

Vote No on the re-opening of the Idaho-Maryland Mine.

Thank you,



Judy McGrain



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## **INDIVIDUAL LETTER 413: JUDY MCGRAIN**

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### **Response to Comment Ind 413-1**

Please see Master Responses 14 through 16 regarding groundwater and impacts to wells. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 413-2**

Please see Master Responses 18 through 22 regarding air quality. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 413-3**

Noise and vibration impacts are addressed in Chapter 4.10, Noise and Vibration, of the DEIR sets forth Mitigation Measures 4.10-1 through 4.10-4 to reduce the severity level of potential impacts that would otherwise be significant. In the case of Impact 4.10-1, the DEIR discloses that even with incorporation of Mitigation Measure 4.10-1, the impact would remain significant and unavoidable. Additionally, please see the discussions and analyses in Chapter 4.1, Aesthetics, of the DEIR which in Impact 4.1-2 finds the project would result in a significant and unavoidable impact to visual character and quality of the area. Because significant and unavoidable impacts have been identified in the DEIR, for which feasible mitigation measures cannot reduce the potential impact to a less-than-significant level, the County, should it decide to approve the proposed project, would be required to adopt a Statement of Overriding Considerations.

### **Response to Comment Ind 413-4**

Please see Master Response 1 and Response to Comments Ind 413-2 and Ind 413-3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 414**

**From:** Judy Miner <jaminer3@gmail.com>  
**Sent:** Saturday, April 2, 2022 2:34 PM  
**To:** Idaho MMEIR  
**Subject:** DEIR for reopening Idaho-Maryland Mine

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Dear Matt Kelley and Nevada County Planning Department,

**Ind 414-1**

My husband and I (Brian and Judy Miner) strongly object to the opening of the Idaho Maryland Mine and the Canadian company proposing this endeavor. Rise Gold's past projects produced failures that compromised the surrounding land and nature while providing zero resources for recouping the damages they created. More importantly, we believe that opening the mine would be detrimental to our community, environment, water supply, wildlife, real estate values, and most importantly our quality of life in this beautiful community we've called home for the last 6 years.

**In 414-2**

Reasons for objecting to the opening the Idaho-Maryland Mine are as follows:

**Ind 414-3**

- Rise Gold's plans to dewater the mine puts wells, creeks, and aquifers at risk.

**Ind 414-4**

- Our air quality is already poor in our community. This will make a bad situation truly terrible with Fugitive dust from rock crushing, transporting, and diesel exhaust from constant truck traffic.

**Ind 414-5**

- Gold mining is a power-hungry business, which will require significant use of fossil fuels. The mine's estimated power usage will be 12% of what the whole of Nevada County uses in a year, raising questions about further straining our power grid and effectively erasing the gains our County was planning to make in reducing power consumption to curb climate change.

**Ind 414-6**

- Increased truck traffic, higher noise levels, and vibration from blasting will ruin our neighborhood quality of life. Our natural settings will be compromised and get buried beneath mountains of mine waste and a paved industrial area.

**Ind 414-7**

- The enormous unimaginable environmental risks far out way the few jobs gained, (false claims of bringing jobs to the community are misleading and statistically and feasibly false), which includes tourism, high tech businesses, private wells, and 10's of millions lost in property values, all of which were NOT included in the current environmental review process. Analysis and study of these economic impacts must be included in an economic analysis in the Draft Environmental Impact Report (DEIR).

**Ind 414-8**

- Rise Gold is untrustworthy given their 14 year old company history, have never opened a mine and never made a profit. Their current financials are weak. And most importantly, their CEO's prior venture polluted tribal waters, went bankrupt, and left Canadians with a bill to pay for cleanup.

It is no longer the 1940s when this area was a small little mountain town. It is a sprawling beautiful community. The impact of this reopening would be devastating to our community and adversely affect all those that call it home, including our Cedar Ridge home, which would be directly affected due to its proximity to the mine.

The cost to the community and the surrounding areas is too great and MUST NOT HAPPEN! For the reasons outlined, coupled with Rise Gold's dubious and untrustworthy record, we vehemently object to the reopening of The Idaho-Maryland Mine.



Thank you for your time. We hope you will do the right thing for our community and it's citizens and object to the opening and VOTE NO.

Sincerely,

Brian and Judy Miner

Sent from my iPad





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## **INDIVIDUAL LETTER 414: JUDY AND BRIAN MINER**

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### **Response to Comment Ind 414-1**

Please see Master Responses 1 through 3. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 414-2**

Please see Master Responses 13 through 15. The commenter expresses general concerns regarding the project's impacts to groundwater but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 414-3**

Please see Master Responses 12 and 18 through 23. The commenter expresses general concerns regarding the project's air quality impacts but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 414-4**

Please see the analysis under Impact 4.3-4, which evaluates the proposed project's potential to result in inefficient or wasteful use of energy and starts on page 4.3-86 of the DEIR. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 414-5**

Please see Master Responses 1 and 8 through 10. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 414-6**

Please see Master Response 2.

### **Response to Comment Ind 414-7**

Please see Master Response 3.

### **Response to Comment Ind 414-8**

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 415

*Do NOT!*

**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JULIE BARNUM  
Address 12864 LAKE SHORE N ZIP 93602  
Phone 530 613 4255  
Email Address JRCLWING@GMAIL.COM

Ind 415-1



## **INDIVIDUAL LETTER 415: JULIE BARNUM**

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### **Response to Comment Ind 415-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 416**

**TO: Matt Kelley, Senior Planner – Nevada County Planning Department**

**RE: Comments on Rise Gold’s Draft Environmental Impact Report**

My area of concern regarding Rise Gold’s DEIR is the handling of the Centennial Industrial Site. In the Executive Summary (Chapter 2), there is a summary of project alternatives (2.4), and Alternative 2 calls for the Elimination of the Centennial site—an alternative that the DEIR promotes as the best choice for the environment.

However, this alternative definitely does not meet CEQA guidelines. The Centennial site is a noteworthy part of the whole mine proposal, not an isolated piece of property, and CEQA guidelines specifically define a project as “the whole of the action” that may result either directly or indirectly in physical changes to the environment.

By omitting the Centennial site from the environmental review process, Rise Gold is sidestepping its obligation to clean up the site—a site where toxic mine waste was deposited several decades ago. Last year, Rise Gold submitted a Remedial Action Plan to the Department of Toxic Substances Control that called for the destruction of healthy wetlands and riparian areas that cover close to 70 percent of the whole site.

According to the RAP, Rise Gold wanted to dig up existing wetlands to use as clean fill to cap the contaminated portion of the site. But the wetlands on the property are *uncontaminated*, and they play an active role in the ecosystem. Among other functions, they filter water, reduce erosion and sequester greenhouse gases. They are a precious natural resource and they need to be protected, not used as a “cap” and destined to be buried under tons of rubble trucked from the mine site in the future.

From what I understand, there was so much hue and cry from the public regarding the RAP that the DTSC has yet to formally endorse the proposed clean-up plan. And yet, in Chapter 4 of the DEIR, there is an aerial photograph that shows a big white patch in the middle. Under the photo, the caption reads: Figure C – “IMM Project Baseline after DTSC Cleanup.”

This means Rise Gold is attempting to use an adjusted environmental baseline—a future baseline that ignores the present conditions and assumes that the DTSC clean-up has already taken place, which again, does not comply with CEQA guidelines, which state: “An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published.” Therefore this section of the DEIR is flawed and deficient and needs to be rewritten.

I appreciate having you include my comments in the record.

Julie Becker 13345 Evergreen Drive Nevada City - Submitted April 2, 2022

**Ind 416-1**



## **INDIVIDUAL LETTER 416: JULIE BECKER**

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### **Response to Comment Ind 416-1**

Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 417**

March 30, 2022

Matt Kelley, Senior Planner  
Nevada County Planning Commission  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

Dear Mr. Keeley,

I am writing in response to the DEIR and the proposal to re-open the Idaho-Maryland Mine by Rise Gold. I'm deeply opposed to it. A mine that would operate 24 hours a day, 7 days a week, up to 80 years is shocking, which should be enough to stop the mine right now. Mitigations in the DEIR that deal with the following concerns are inadequate:

**Ind 417-1**

The airborne toxic mining dust, i.e. asbestos and other toxins, would worsen our air quality. Our air quality is already a problem that will be aggravated by the Climate Crisis. Our children in Nevada County already have high levels of asthma, because of poor air in Nevada County. Claims that a few hundred local jobs will be created (if even true) do not justify the serious threat that this mine will be to our children and adults over 80 years. We don't have the right to allow this mine to damage present or future generations. We need to clean up our air, not allow it to be made worse.

**Ind 417-2**

Blasting 7 days a week in tunnels under 2,585 acres across Grass Valley and a large factory on Brunswick Road in the middle of hundreds of family homes in a residential community can't be mitigated. Trucks hauling 1,000 tons of waste rock every day, all day long along Brunswick Road and piling the rock higher than a 6 story building at the Centennial site is shocking!!!

**Ind 417-3**

Removing 1 to 3 million gallons of contaminated water per day for the next 80 years and dumping it into Wolf Creek and contaminating the Creek is horrific. The de-watering of homeowners' wells is also a very serious risk to take, which people and the school up on the Ridge have had to struggle with. This, along with all the other issues should be enough to stop all future mining in Nevada County.

**Ind 417-4**

We have also been living for 66 years with the toxic waters of the Empire Mine, with the State of California still trying to clean it up. Taxpayers are paying to clean up the water, because the mine owners walked away without being held responsible for the damage.

**Ind 417-5**

These are a just a few of the serious problems that the mitigations can't deal with. I have lived in Nevada County for 33 years and love our community. We live in a beautiful County that deserves to live in peace and quiet and not be damaged by a company only interested in the money filling the owners' pockets.

Please share this letter with the rest of the Planning Commission. Please stand up to stop this mine by recommending that the Supervisors deny this mine permit.

Sincerely,



Julie Carville  
14582 Alderwood Way, Nevada City  
530 265-4741  
mtngypsy1@sbcglobal.net



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## **INDIVIDUAL LETTER 417: JULIE CARVILLE**

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### **Response to Comment Ind 417-1**

Please see Master Response 1, 16, and 18 through 24. The commenter expresses general concerns regarding the project's impacts to air quality but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 417-2**

The DEIR evaluates the potential for the proposed project to generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of applicable standards under Impact 4.10-3, which starts on page 4.10-37. As detailed therein under the Blasting subheading, based on project site characteristics and a long-term blasting noise level survey conducted for the proposed project over the course of 30 days at the Sutter Gold Mine in Amador County, the worst-case maximum noise levels at the nearest noise-sensitive receptors to the project site would range from 52 to 57 dBA  $L_{max}$ . The range of predicted worst-case blasting noise levels of 52 to 57 dBA  $L_{max}$  is below the daytime, evening, and nighttime dBA  $L_{max}$  criteria at the nearest receptors (refer to Table 4.10-6 on page 4.10-18 of the DEIR for daytime, evening, and nighttime noise criteria for each receptor).

### **Response to Comment Ind 417-3**

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 417-4**

Please see Master Responses 13 through 15 and 35. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 417-5**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 418**

Dist 1

**RECEIVED**

MAR 03 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Nevada County Board of Supervisors  
950 Maidu Ave. #200  
Nevada City, CA 95959

Dear Heidi Hall, Ed Scofield, Dan Miller, Sue Hoek and Hardy Bullock,

I have been a resident of Nevada County for 25 years and have lived on Greenhorn Road for the past 7 years.

**Ind 418-1**

I am writing to express my deep opposition to the reopening of the Idaho-Maryland Mine. I have read the summary DEIR and listened to many informed opinions. The significant number of potential, and even probable, negative impacts to our area are alarming. Noise, traffic, vibrations from underground blasting, air and water pollution, loss of well water for local residents. All of these, and more, should give us pause before gambling away our quality of life.

**Ind 418-2**

Given what is at stake, and to evaluate the potential risks, it is essential to understand the background of the Rise Gold company. I hope you have all read the 2/22/22 column in The Union written by Randal Snodgrass. He points to the company's last project, where Rise Gold filed for bankruptcy and left the public and government with hundreds of thousands of dollars in costs. Rise Gold was charged with 35 counts of failing to comply with environmental and safety standards.

We can see clearly who Rise Gold really is. We can choose to avoid the losses suffered by the people of British Columbia.

**Ind 418-3**

The remaining issue will be how to provide more jobs in Nevada County. Universal broadband, filling out infrastructure in existing industrial areas are potential starts. True leadership will take us in new directions, not repeating the errors of the past.

Thank you,  
Julie Enzor-Wilson



## **INDIVIDUAL LETTER 418: JULIE ENZOR-WILSON**

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### **Response to Comment Ind 418-1**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 418-2**

Please see Master Response 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 418-3**

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 419**

Matt Kelley  
Nevada County Planning Commission  
950 Maidu. Ave. Suite. 170  
Nevada City, CA. 95959

Dear Mr. Kelley,

**Ind 419-1**

I have been a resident of Nevada County for 25 years and have been living on Greenhorn Road for the past 7 years.

I am writing to express my deep opposition to the reopening of the Idaho-Maryland Mine. I have read the DEIR Summary and listened to many informed opinions. The potentially harmful impacts to our community are many and alarming.

**Ind 419-2**

First, the aesthetic degradation of our area from noise, traffic, vibrations from underground blasting, in addition to a six story industrial building, have no place in a tourist focused area. Though these issues were addressed in the DEIR it is absolutely true that these problems will still exist. It will be a great loss to those of us who chose to live here for the peace of a rural community.

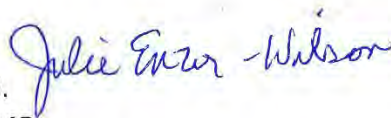
**Ind 419-3**

An even more alarming impact will be on our water, both the quantity and the quality. It has been documented that California is experiencing the worst drought in 1200 years. Absolutely no one is suggesting that we will return to pre drought conditions any time soon. In these circumstances it would be negligent and potentially disastrous to allocate such enormous amounts of water to a foreign entity - one which is currently charged with water pollution in their last project. The DEIR does not address climate change and is inadequate to meet the moment. To suggest that adding 30 wells to NID will solve the problem is an insult to all of us

**Ind 419-4**

These and the many other potential harms of reopening the mine far outweigh the benefits. Please reject this project.

Sincerely,  
Julie Enzor-Wilson  
16495 Greenhorn Rd.  
Grass Valley, CA 95945





## **INDIVIDUAL LETTER 419: JULIE ENZOR-WILSON**

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### **Response to Comment Ind 419-1**

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 419-2**

As affirmed by the commenter, pursuant to the requirements set forth by CEQA Guidelines Section 15121, the DEIR assesses all potential project impacts that could occur to all environmental issue areas required for analysis under CEQA. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project. Please see Master Responses 1 and 2.

### **Response to Comment Ind 419-3**

Please see Master Responses 13 through 16 regarding groundwater. The commenter expresses general concerns regarding water quality and quantity impacts associated with the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 419-4**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 420**

**From:** [Juliette Phyllis Kunin](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** Proposed mine reopening  
**Date:** Monday, March 14, 2022 3:40:55 PM

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**Ind 420-1**

To whom this may concern.

I do not understand why this proposed mine has even a chance of being approved.

From the stories questioning the integrity of the company itself, the obvious air, water, sound pollution, why in the world would we be approving a Canadian firm to come in to our beautiful area and risk ruining our way of life????

We still have mercury in the waters from mining done decades ago. This company does not even have a game plan for how not to pollute our waters again! A mine that will be operating constantly will be very noisy as well as having a terrible impact on our air.

**Ind 420-2**

Our property values will go down, our wells may be impacted and our wonderful water polluted.

How could this tragedy even have a chance of happening?????

Someone please explain to me.

Thanks for the opportunity to give my input and I pray that this will not happen.

Thank you, Phyllis Kunin



## **INDIVIDUAL LETTER 420: JULIETTE KUNIN**

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### **Response to Comment Ind 420-1**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 420-2**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 421**

June A. Oberdorfer, March 27, 2022

Comments on Groundwater Modeling, Idaho-Maryland Mine

**Documents reviewed:**

- 1) Itasca Denver, Inc., March 2020a, *Predictions of Groundwater Inflows to the Underground Mine Workings at the Idaho-Maryland Mine.*
- 2) EMKO Environmental, Inc., March 2020a, *Groundwater Hydrology and Water Quality Analysis for the Idaho-Maryland Mine Project, Nevada County, California.*
- 3) EMKO Environmental, Inc., March 2020b, *Appendices, Groundwater Hydrology and Water Quality Analysis for the Idaho-Maryland Mine Project, Nevada County, California.*
- 4) Itasca Denver, Inc., December 2020b, *Groundwater Monitoring Plan, Idaho-Maryland Mine Project.*

**Concerns:**

Simulations by Itasca (2020a) of the effects of mine-dewatering produced a map of predicted drawdowns after 25 years of dewatering (Figure 5-7). The contours of equal groundwater drawdown in this figure show a maximum drawdown of approximately ten feet and the extent of drawdown over one foot approximate the limits of Rise Gold's mineral rights. This figure was reproduced by EMKO (2020a) and served as the basis for determining which private wells would experience excessive drawdown and thus need to be mitigated with a supplemental water supply from the Nevada Irrigation District.

An incorrect assumption was made in the running of these future predictions of mining impacts which led to a significant underestimation of groundwater drawdown, both in magnitude and areal extent. This assumption needs to be corrected to get both a more accurate prediction of the extent of the well drawdown caused by the predicted 25 years of mine-dewatering and a more accurate determination of the number of wells needing to be mitigated with supplemental water supply.

The computer model was calibrated to match historic dewatering rates (700 gallons per minute [gpm] toward the end of historic mining in 1956) and one groundwater measurement taken from near the end of the historic mining period at the Union Hill Mine shaft (a small mine that had been inactive for many decades). These calibrations are reflected in Figure 4-7 (Itasca, 2020a). The lower part of this figure shows a hydrograph (water elevation versus time) for simulated water levels within the New Brunswick Mine for the 700-gpm dewatering rate. Simulated water levels in the mine were around 1,150 feet above mean sea level (ft amsl) at the end of historic mining and recovered rapidly to about 2,500 ft amsl after the cessation of mine-dewatering.

The top portion of Figure 4-7 (Itasca, 2020a) shows a hydrograph of the calibration to the historic water level measurement in the Union Hill Mine shaft at the end of mine-dewatering when the water level was approximately 20 feet lower than at present. In order to calibrate to this

Ind 421-1





one historic water level, Itasca had to insert a very low permeability barrier next to the Union Hill Mine into the model to create sufficient hydraulic isolation of the Union Hill Mine from the much lower water levels in the adjacent area. The hydraulic isolation of this Union Hill Mine area is supported by the fact that the current water levels in its shaft are about 165 feet higher than water levels in the New Brunswick Mine.

What is not known, other than at this one point in the Union Hill Mine, are the shallow groundwater levels in 1956. Itasca (2020a) does not present a map of groundwater drawdown for 1956 (as they do for the predictive modeling of 25 years into the future). Those simulated water levels in 1956 would provide important insights into what future water levels during mine dewatering would be and should be presented.

The water level in the Union Hill Mine shaft is shallow, and it is quite likely that the drawdown in 1956 in the shallow groundwater to the west (in the vicinity of the New Brunswick Mine) was significantly greater than the 20 feet observed at the Union Hill Mine, probably on the order of or greater than the 165-foot water level difference observed at present. Water levels to the west could have been on the order of 185 feet or more lower than present (20 feet plus 165 feet). It is a major shortcoming of Itasca's modeling report that they do not provide a drawdown map or hydrographs of the effects of historic mine-dewatering on the shallow aquifer.

The incorrect assumption that was made in the predictive modeling of future 25 years of mine-dewatering was in the initial condition (starting water levels) for that predictive simulation. Rather than taking present day water levels as the starting point for predicting the effects of mining for 25 years starting in 2019, they chose to use the water levels at the end of mining in 1956 (Sec. 5.1). Those water levels don't reflect the fact that there's no current dewatering, but rather reflect dewatering at a rate of 700 gpm. The incremental drawdown from increasing dewatering from 700 gpm to the future rate of 900 gpm is what is reflected in the map of impact (Figure 5-7, Itasca, 2020a) used to determine the area requiring mitigation by Rise Gold. Examining the predicted drawdown in Figure 5-7 in the vicinity of the Union Hill Mine, it would be expected to be greater than the historic drawdown measured of 20 feet if dewatering has increased over the historic rate. With drawdown being proportional to pumping rate, the drawdown would be expected to be on the order of 25 feet in the vicinity of the Union Hill Mine. Instead, drawdown in this area is on the order of a few feet (Fig. 5-7). Drawdowns further to the west in the vicinity of the New Brunswick Mine should be considerably greater than 20 feet, which they are not. This reduced drawdown compared to what was observed historically is the result of the incorrect assumption for the initial condition for predictive modeling.

This incorrect assumption minimizes both the magnitude of drawdown shown on the Figure 5-7 and the extent of the area affected. In addition to underestimating the number of domestic water supply wells impacted and requiring mitigation, this assumption also underestimates the extent of the area requiring groundwater monitoring (Itasca, 2020b). That area needs to be expanded. If the effects on dewatering on the discharge to nearby streams were calculated similarly to the effects on groundwater drawdown, then the amount of decrease in groundwater discharge to adjacent streams could be underestimated as well.



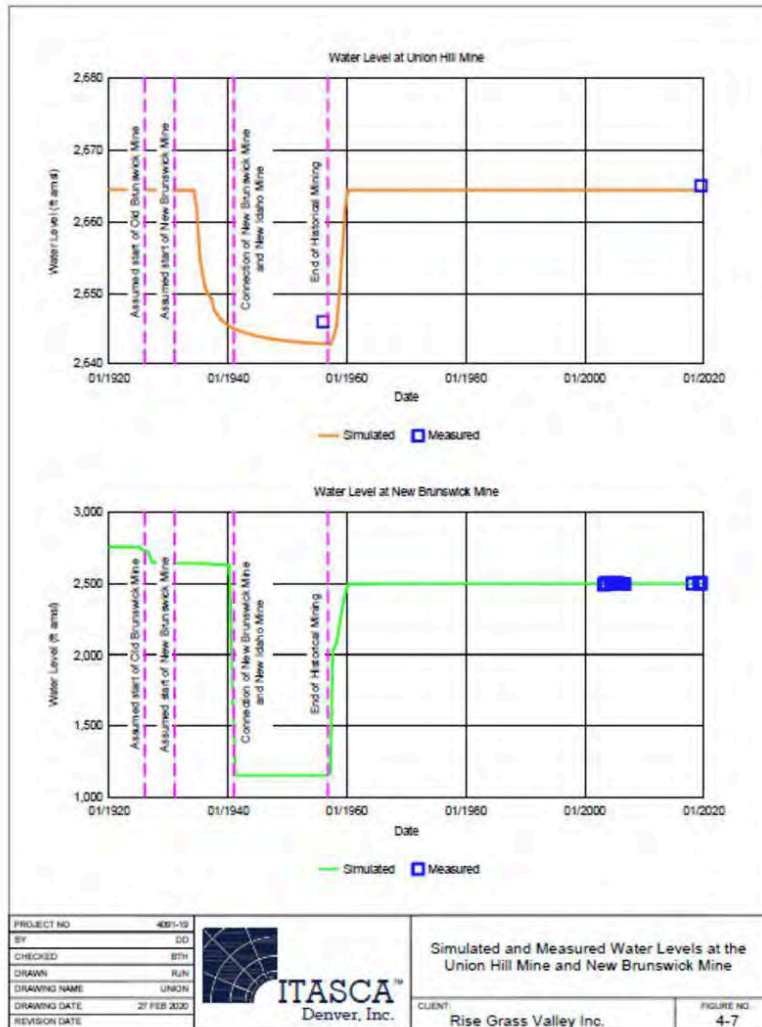


↑ Itasca should clarify the results of their simulations by producing:

- 1) Both a groundwater drawdown contour map and a groundwater elevation contour map for the shallow aquifer immediately before the cessation of dewatering in 1956.
- 2) Hydrographs for simulated heads in the shallow aquifer for the historic period 1920 to 2020 plus continuation for the 25 years of predictive modeling for future mining. The hydrographs should be for groundwater elevation in ft amsl versus time for the 125 years and represent the heads in the shallow aquifer near wells labeled WS95, WS216, WS201, WS80, WS 91, and WS85 on Itasca Figure 2-6.
- 3) Model water budget (all volumetric water inputs and outputs) for the general area of the mineral rights boundary over the 125 years simulated, preferably in plot rather than tabular format, using the one-month time increment used in the modeling.
- 4) The model should be run using the 2019 water levels as the initial conditions for the predictive simulations. Contour maps, hydrographs, and water budgets should be provided for these revised predictive runs.







## **INDIVIDUAL LETTER 421: JUNE OBERDORFER**

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### **Response to Comment Ind 421-1**

This letter is a duplicate copy of content in Group Letter 8. Please see Comments and Responses to Comments Grp 8-127 through Grp 8-133.



**Individual Letter 422**

Justine Jacus  
District 1  
Grass Valley

Nevada County Planning Department

To Whom It May Concern,

**Ind 422-1**

I have several points of view regarding the mining situation. Number one, is the amount of noise and traffic on the roads that will be generated from the mine, it is completely unacceptable.

**Ind 422-2**

Number two, is taking that much water from underground, and to do so during a drought and dredging up all the toxins that will come with it, is completely wrong. This will not only affect the environment; the streams, rivers, agriculture, air quality, and wildlife, but it will also directly affect citizens of Nevada County's personal underground wells. In my opinion, it will irrevocably change our way of life and change the serenity of this beautiful area we call home. As far as this

**Ind 422-3**

company, Rise Gold, their past history alone should be enough to deem them unworthy to even work on this ill fated project. It should not be about one company's greed, it should be about preserving the quality of life that we have all come to love. I personally think their promise of boosting our economy is a sham, it will not bring jobs to our county, but will likely outsource jobs from elsewhere. The end effect being, lining the pockets within the company while negatively affecting our community. And who is to say that they will not just shut down the mine leaving behind a huge toxic dump with no plan to clean it up. I want to see my children and grandchildren to be able to grow up in a beautiful community and area that has so much to offer, without reopening a mine that has the potential to destroy everything we love about this area.

Sincerely,  
Local Citizen and Business Owner Since 1979





## **INDIVIDUAL LETTER 422: JUSTINE JACUS**

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### **Response to Comment Ind 422-1**

Please see Master Response 1. Noise is addressed in the DEIR in Chapter 4.10, Noise and Vibration. Traffic is addressed in Chapter 4.12, Transportation. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 422-2**

Please see Master Responses 1 and 2, 14 through 16, 18 and 19, 30, and 35. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 422-3**

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 423**

Nevada County Planning Commission  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959

March 23, 2022

Dear Commissions Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno

**STATEMENT TO NEVADA COUNTY PLANNING BOARD**

My name is Robert Foster. Live in Grass Valley at 122 Ironhorse Place, just off of Bennett Street.

During my youth, I spent many days in adventure along the banks of the West Fork of Rock Creek, near Red Lodge, Montana. Those days were among the most formative, most important days of my youth. The West Fork of Rock Creek is very, very similar to Wolf Creek. That might be one reason I live in Grass Valley. During that time I grew close to the creatures that lived in that stream.

So, that is why I am here today. The creatures in Wolf Creek need a spokesman--. The Mayflies, the Caddis flies, the Stone flies and the Rainbow trout that live in Wolf Creek

I have read the entire DEIR. I have focused my attention on the section related to Hydrology, Chapter 4.8 of the DEIR. I find that section to be speculative and potentially dangerous—particularly dangerous to Wolf Creek. The Hydrology section contains opinions and statements that are shocking in their naiveté. Some of these opinions relate particularly to the maintenance and operation of the Settling Pond. Make no mistake about it, the Settling Pond is a key feature to the entire potential operation of the mine. Without the Settling Pond, the application would violate CEQUA, and have no possibility. And, from my perspective, the Settling Pond is one of the most dangerous features of the application. The Settling Pond takes water that contains Iron and Manganese amounts that far exceed limits, and Arsenic and Cyanide that exceed limits, and produces water for delivery into the South Fork, and on into Wolf Creek proper. When you read over the section on water treatment, there no doubt that treatment to remove the offensive materials is complicated, and requires constant attention, constant monitoring and constant money. All of the offensive materials are deposited on the floor of the Settling Pond. Thus, the



Ind 423-1



↑ sledge at the bottom of the Settling Pond is intended to be a concentrated soup of materials that are potentially harmful and in some cases, known carcinogens. Antimony and Chromium are known carcinogens. The DEIR assumes, without any supporting facts, that the applicant will have the money and the will to spend what is necessary to keep the water within safe limits. That assumption is a totally false assumption. Everyone, including the applicant, knows that eventually the mine would become unprofitable. That happens to all mines, and will happen to this mine. When the mine becomes unprofitable, there will simply be no money for the proper treatment of water. The water released will then be toxic and likely contain known carcinogens. The answer to this hazard in the DEIR is that responsibility for safe operation of the mine becomes the responsibility of the State Water Resources Regional Board. Seriously?? This body would never assume responsibility for such a complicated and expensive operation. That entity, to my understanding, has three employees who are responsible for the entirety of Nevada, Placer, and Sierra Counties.

From a practical point of view, the water, and potentially the sludge as well, would simply flow into the Wolf Creek watershed. Goodbye Mayflies, goodbye Rainbow trout. Similarly, the DEIR assumes honest and faithful maintenance and operation of water treatment facilities. That assumption is false. This applicant has a demonstrated history of willful noncompliance with environmental rules. For the writers of the DEIR to assume faithful compliance is a serious assumption that is unwarranted by the history of this applicant.

The plan for removal of the toxic sludge is borderline comical. Again, the sludge will contain concentrated amounts of Manganese, Antimony, Chromium, Arsenic and Cyanide. The plan is to remove that material "off of site." I guess the idea is that you shut down mining operations, which is not going to happen, get some dump trucks into the Settling Pond somehow, and haul thousands of tons of material and dump that material "off of site." I guess the idea is that you pay somebody in Placer County or in Sierra County, to give you the right to dump this sludge on their property. What I find borderline funny is that these experts somehow believe that such a release of highly toxic material complies

↓

with CEQUA. Seriously?? We have a new exception to the requirements of CEQUA, the “off of site” exception.

The fundamental assumption of the entire DEIR, is that everything is going to proceed according to their approved plans. The assumption is that compliance will be faithful and continuous, for a period of 80 years. From my point of view that assumption doesn’t begin to pass the smell test. No gunna happen. What will happen, is some event, some series of events, which will cause a lapse in compliance. With a certainty, non-compliance will occur when the mine runs out of money. When that happens, it is more likely than not, that toxic water and toxic sludge will be released into Wolf Creek. There is then, the distinct possibility that Wolf Creek and maybe even The Bear River will be superfund site. That possibility is horrendous.

**Ind 423-2**

What I ask you to do is to return the DEIR to Sacramento, and ask the following questions:

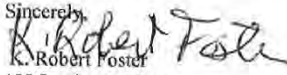
1. Regarding water treatment: What it the plan for paying for water treatment after the Applicant is no longer able to pay for treatment?

**Ind 423-3**

2. Regarding periodic removal of toxic sludge from the Settling Pond:
- Will mining operations be shut down for removal of sludge?
  - How long will removal take and how will it be accomplished?
  - Who will pay for removal of sludge when the Applicant can’t?
  - How will disposal of the sludge be accomplished?
  - Is there in place a definite plan for disposal of sludge that meets with CEQUA requirements?

**Ind 423-4**

Thank you. My goal here is to ensure that there is a healthy Wolf Creek for future Generations to appreciate and love.

Sincerely,  
  
K. Robert Foster  
122 Ironhorse Place  
Grass Valley 95945  
Tel: 209-366-4626



## **INDIVIDUAL LETTER 423: K. FOSTER**

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### **Response to Comment Ind 423-1**

The commenter states that the settling pond is one of the most dangerous features of the project and water treatment is complicated and requires constant monitoring. The commenter states that the DEIR wrongly assumes the water treatment and settling pond component of the project will go according to plan without any accidents. However, the commenters does not explain how the DEIR is inadequate or how the settling pond will fail and discharge untreated water to South Fork Wolf Creek. As stated in CEQA Guidelines Section 15384, “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.” As this comment amounts to speculation, no further response is necessary. For information regarding the water treatment process, the commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek. As explained in the DEIR and Master Response 35, the primary method of on-site treatment is not the settling pond, but the water treatment plant, which will be permitted by the Central Valley Regional Water Quality Control Board.

The commenter also states that the DEIR fails to identify the management of the settled solids from the treated mine water. Section 5.4 of Appendix K.4 of the DEIR provides a detailed description of the management of settled solids in the water treatment pond. As described, the removal of these solids would not require the mine to shut down mining operations. The dewatered solids would be dewatered and hauled to an appropriate and approved offsite landfill.

Regarding the commenter’s assertions that the Project Applicant will not implement the mitigation measures described in the DEIR, a mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 423-2**

The commenter asks who will fund the water treatment process in the event the Project Applicant is unable to pay. As stated in CEQA Guidelines Section 15384, “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.” As this comment amounts to speculation, no further response is necessary.

### **Response to Comment Ind 423-3**

The commenter asks a series of questions pertaining to the removal of settled solids from the settling pond. Section 5.4 of Appendix K.4 of the DEIR provides a detailed description of the management of settled solids in the water treatment pond. As described, the removal of these solids would not require the mine to shut down mining operations. The dewatered solids would be dewatered and hauled to an appropriate and approved offsite landfill.

### **Response to Comment Ind 423-4**

The commenter states that their goal is to ensure a healthy Wolf Creek for future generations. The comment is noted.





**Individual Letter 424**

**From:** Kali Feiereisel <kali.feiereisel@gmail.com>  
**Sent:** Sunday, April 3, 2022 8:48 PM  
**To:** Idaho MMEIR  
**Subject:** Mine Comment

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Dear Mr. Kelley,

I have been living in Nevada County for 11 years and my husband and I recently welcomed our daughter Mabel. We hope that she can grow up safely here, but this proposed mine is of high concern to us.

I am very concerned about arsenic, ammonia, and other contaminants from treated mine waste water polluting downstream irrigation water and prohibiting farmers from using the water.

**Ind 424-1**

A 2021 study by Sandil et al titled, "Effect of arsenic-contaminated irrigation water on the growth and elemental composition of tomato and cabbage cultivated in three different soils, and related health risk assessment," found that cabbage and tomato plants absorb the arsenic into their roots, leaves, and the edible portion of the crop. The study cites the arsenic threshold for drinking water is 10 µg/L (WHO, 2001), and for irrigation water is 100µg/L (FAO, 1994).

In chapter 4.81-1 of the DEIR, related to water it states, "The treatment process would also reduce the concentrations of arsenic and ammonia, both of which have been detected in low concentrations in surface seeps near the mine."

What does reduce mean? Please provide specific information on what levels of arsenic will be allowed to be in the treated mine waste water discharge. At a minimum the arsenic levels allowed in the treated mine water discharge should be aligned with the FAO's 100µg/L, if not more strict.

**Ind 424-2**

Additionally, the mine discharge water should not be tested once a quarter, but everyday, to have as close to real time tracking on the water (and any contamination it might be spreading) being discharged from the mine.

Thank you,  
Kali Feiereisel



## **INDIVIDUAL LETTER 424: KALI FEIEREISEL**

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### **Response to Comment Ind 424-1**

The commenter is concerned about arsenic, ammonia, and other contaminants being discharged to South Fork Wolf Creek. The commenter points to a study highlighting the harmful effects of these contaminants on soil and produce. The commenter states that the DEIR requires more specific information regarding these contaminants in the mine water. As indicated by Table 4.8-2 in the DEIR, the requirement for the treated mine water discharge is less than 10 micrograms per liter for arsenic and less than 25 micrograms per liter for ammonia. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 424-2**

The commenter states that the water discharged to South Fork Wolf Creek should be monitored daily. Monitoring of water discharge will be done in accordance with requirements of the approved Notice of Intent and the Central Valley Regional Water Quality Control Board. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.



**Individual Letter 425**

**From:** Karen Farlee <karenfarlee@sbcglobal.net>  
**Sent:** Saturday, April 2, 2022 8:15 PM  
**To:** Idaho MMEIR  
**Subject:** Mine DEIR

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**Ind 425-1**

In my opinion, the county should not accept the current EIR. The first and most important point to me is the effects on local water sources. Much of the data used was based on normal or average rain years. After 3 years of extreme drought normal and average water calculations do not hold up.

**Ind 425-2**

One of the other issues that concern me is air quality. First of all when you look at data based in Blue Canyon how much is applicable to Nevada City and Grass Valley. Locally we have been dealing with increased pollution from Sacramento Valley, let alone the effects to our air from local wildfires.

**Ind 425-3**

Please look carefully at the basis of lack of current local information and understanding local needs turn down this report and application for reopening this mine.

Karen Farlee  
Nevada City

Sent from my iPad



## **INDIVIDUAL LETTER 425: KAREN FARLEE**

---

### **Response to Comment Ind 425-1**

This commenter is concerned with the impacts of the project on local water sources and is concerned that the DEIR uses average rainfall data in light of the drought that California is currently experiencing. However, the water supply assessment prepared for the project's water consumption includes analysis of single and multiple dry-year scenarios. Additionally, please see Master Response 16 - Drought and Climate Change.

### **Response to Comment Ind 425-2**

This comment expresses concern regarding the project's impacts to air quality and questions the extent to which data based in Blue Canyon is applicable to Nevada City and Grass Valley.

The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA. In regard to existing baseline air quality, please see Master Response 18 - Air Quality Thresholds.

### **Response to Comment Ind 425-3**

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.



Individual Letter 426



Karen Melquist  
18209 Cruzon Grade Road  
PO Box 1675  
Nevada City, CA 95959

Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

Re: DEIR Rise Gold

Commissioners:

I appreciate this chance to respond to the Idaho-Maryland Project draft EIR. The difficulty I have found in this document is tracking the dirt. **DIRT** - engineered, bare rock, wet, mixed, impermeable, clay, loamy - is what is left behind in a mining project whether it comes to an end as unprofitable, delayed, abandoned or bankrupt.

What it needs is a dirt budget similar to a water budget when analyzing a closed system. In order to visualize what is proposed, one has to coordinate shift schedules, vehicle schedules, vehicle capacity, mine development, projected fill site quotas, tonnage for vehicles, predicted trip numbers, cubic-feet, on and on it goes.

We are told that at planned capacity once the project is rolling the tons of material produced annually is 557,000 tons. At mining year 7, the two fill projects will have used 3,800,000 tons. An eighty-year permit less estimated 1.5 years for construction and the high of five years for closure, the applicant could mine for 72.5 years. To get a concept of how much dirt could accumulate at Brunswick in 72.5 years – ignoring gold concentrate and fill customers as a worst case – 35,620,000 tons of the stuff would accumulate.

In mining year 12, there is enough dirt to accomplish Alternative 3 – storing an additional 2.3M tons at Centennial. In mining year 15, another 1.7M could be stored at Brunswick. Ta-dah - Alternative 2! - a potential Alternative 5, a 20-year permit with 5 years for closure. 4,000,000 tons of the stuff tucked away. (Did you notice? The DEIR has two estimates for fill - 3.8M tons in the project description and 4M tons in the Alternatives. Tsk, tsk, an unexplained internal inconsistency of data.)

Missing for these scenarios:

Market study for **clean** fill needs within 60 miles (DEIR haul radius)

Qualified Engineer analysis of fill product

No closure plan for intermittent, inevitable or permanent shut down of project in re dirt

OHV crowd will come from miles away – must include bond for 24/7 security

The phrase “engineered fill” is used (473 times in 1070 pages), replace with dirt and the picture of this project changes dramatically.

Ind 426-1

Ind 426-2





Ind 426-3

I was interested to find if the DEIR would tackle the subject of interconnected tunnels. It does admit Union Hill has “a poor hydraulic connection between these two mines” which is included in the water model. Apparently, there is no hydraulic connection to the behemoth to the West – the Empire – 367 miles of workings, 11,007 feet deep. There is no information on how closely those works are to this project possibly requiring an evaluation.

Page 4.8-14 Union Hill Mine workings are within 95 to 180 feet of workings of the Brunswick at three or four different levels.

The water modeling did not run a scenario for the Union Hill abruptly flooding the Brunswick. No study of the strength of this material under years of vibration, blasting or dewatering has been included.

Ind 426-4

The DEIR looks at sink holes and dewatering only within the Project surface property (Geotechnical Assessment of Near Surface Mine Surfaces). No assessment is included of the impact on surrounding properties, not even the East Bennett impacted residences. The original information is NV5. Geotechnical Engineering Report, Idaho-Maryland Mine Project – Brunswick Industrial Site [pg. 11]. November 18, 2019. Definitely a limited study.

(I did learn a new historical term that’s fun: shaft shifting where timber beams finally give way and there goes the back yard.)

Ind 426-5

Appendix K.9\_Idaho-Maryland Well Mitigation Plan is included in the DEIR. It is an in-house document citing various authorities on the details of the proposed mitigation of 30 (26) wells on East Bennett. RISE will:

Reimburse cost of NID annually

Reimbursement will cease when the property is sold or the property is annexed to the City of Grass Valley

Neither Grass Valley, the current property owners nor future owners should pay for water so long as the company dewateres the wells. There is no guarantee the wells will recover – in volume or quality – once dewatering ceases. No mention is made for the inevitable temporary closures or abandonment of the project altogether. Is the County by issuing the permit the ultimate responsible party? An adequate bonding arrangement is required.

Ind 426-6

The monster in the closet is cleaning up the Centennial toxic dump. Since the 1960’s when the property had reverted to private owners, yet nothing has been accomplished. IMM walked away; the City of Grass Valley walked away and RISE itself has delayed a real commitment. The Voluntary Cleanup Agreement may be “unilaterally terminated with 30-day notice.” Unilaterally means for no reason, no consequence for failure to complete. The DEIR in deciding the environmentally superior plan is Alternative 2 (no Centennial use) .. ha, ha .. except for page 1-8, EIR PROCESS states

While it may be suggested that the Centennial Clean-Up Project, were it to be successfully completed, could benefit the Idaho-Maryland Mine Project in a **limited way (i.e., serving only as a waste rock stockpile location)**, similar to the court’s ruling in *Banning Ranch*, the Idaho-Maryland Mine Project would not be a “consequence” of the Centennial Clean-Up Project, as the Idaho-Maryland Mine Project can proceed without completion of the Clean-Up project.

There’s that dirt again! The DEIR fiddles around on Alternative 2 ... doesn’t mean it will, doesn’t mean it won’t..



Ind 426-7

Clean-Up of the Centennial (limited as it will be to capping) should be a condition of the permit before they create another.

Where's the market study for Nevada County's *critical need* for industrial acreage

Where's the Qualified Engineer analysis for Brunswick and Centennial sites – not landscape elevations

Where is the temporary closure plan for the inevitable over 80 years ...

open/close cycle for gold price fluctuation

for funding, for abandonment, for bankruptcy

that clay-lined pond requires maintenance every 10 years for one thing!

Ind 426-8

Eagerly awaiting release of the economic analysis -- library fund and all ...

Karen Melquist

cc: CEA-NC

Attachment



PROJECT YEAR	after 1.5 years construction mining year	fill tons mineralized	fill tons non- mineralized	total	I-M fill sites begin off-site sales less 3.8M	total	revise for addl 4M on-site storage
	24	4,380,000	8,760,000	13,140,000	9,340,000	5,340,000	
	25	4,562,500	9,125,000	13,687,500	9,887,500	5,887,500	
	26	4,745,000	9,490,000	14,235,000	10,435,000	6,435,000	
	27	4,927,500	9,855,000	14,782,500	10,982,500	6,982,500	
	28	5,110,000	10,220,000	15,330,000	11,530,000	7,530,000	
	29	5,292,500	10,585,000	15,877,500	12,077,500	8,077,500	
	30	5,475,000	10,950,000	16,425,000	12,625,000	8,625,000	
	31	5,657,500	11,315,000	16,972,500	13,172,500	9,172,500	
	32	5,840,000	11,680,000	17,520,000	13,720,000	9,720,000	
	33	6,022,500	12,045,000	18,067,500	14,267,500	10,267,500	
	34	6,205,000	12,410,000	18,615,000	14,815,000	10,815,000	
	35	6,387,500	12,775,000	19,162,500	15,362,500	11,362,500	
	36	6,570,000	13,140,000	19,710,000	15,910,000	11,910,000	
	37	6,752,500	13,505,000	20,257,500	16,457,500	12,457,500	
	38	6,935,000	13,870,000	20,805,000	17,005,000	13,005,000	
	39	7,117,500	14,235,000	21,352,500	17,552,500	13,552,500	
	40	7,300,000	14,600,000	21,900,000	18,100,000	14,100,000	
	41	7,482,500	14,965,000	22,447,500	18,647,500	14,647,500	
	42	7,665,000	15,330,000	22,995,000	19,195,000	15,195,000	
	43	7,847,500	15,695,000	23,542,500	19,742,500	15,742,500	
	44	8,030,000	16,060,000	24,090,000	20,290,000	16,290,000	
	45	8,212,500	16,425,000	24,637,500	20,837,500	16,837,500	
	46	8,395,000	16,790,000	25,185,000	21,385,000	17,385,000	
	47	8,577,500	17,155,000	25,732,500	21,932,500	17,932,500	
	48	8,760,000	17,520,000	26,280,000	22,480,000	18,480,000	
	49	8,942,500	17,885,000	26,827,500	23,027,500	19,027,500	
	50	9,125,000	18,250,000	27,375,000	23,575,000	19,575,000	
	51	9,307,500	18,615,000	27,922,500	24,122,500	20,122,500	
	52	9,490,000	18,980,000	28,470,000	24,670,000	20,670,000	



PROJECT YEAR	after 1.5 years construction mining year	fill tons mineralized	fill tons non-mineralized	total	I-M fill sites begin off-site sales less 3.8M	total	revise for addl 4M on-site storage
2022-2026 4 years	1	182,500	365,000	547,500			
	2	365,000	730,000	1,095,000			
	3	547,500	1,095,000	1,642,500	Centennial 1.6M 5 yrs		
	4	730,000	1,460,000	2,190,000			
	5	912,500	1,825,000	2,737,500			
	6	1,095,000	2,190,000	3,285,000			
	7	1,277,500	2,555,000	3,832,500	Brunswick 2.2M 6-7 yrs 3.8M total		
2027-2032 5 years	8	1,460,000	2,920,000	4,380,000		580,000	
	9	1,642,500	3,285,000	4,927,500		1,127,500	
	10	1,825,000	3,650,000	5,475,000		1,675,000	
	11	2,007,500	4,015,000	6,022,500		2,222,500	
	12	2,190,000	4,380,000	6,570,000		2,770,000	2.3M addl to Centennial
	13	2,372,500	4,745,000	7,117,500		3,317,500	
	14	2,555,000	5,110,000	7,665,000		3,865,000	
	15	2,737,500	5,475,000	8,212,500	4,412,500 1.7M addl to Brunswick: 4M total		
	16	2,920,000	5,840,000	8,760,000	4,960,000	960,000	
	17	3,102,500	6,205,000	9,307,500	5,507,500	1,507,500	
2033-2102 69 years	18	3,285,000	6,570,000	9,855,000	6,055,000	2,055,000	
	19	3,467,500	6,935,000	10,402,500	6,602,500	2,602,500	
	20	3,650,000	7,300,000	10,950,000	7,150,000	3,150,000	
	21	3,832,500	7,665,000	11,497,500	7,697,500	3,697,500	store 4M Alternatives 2 & 3
	22	4,015,000	8,030,000	12,045,000	8,245,000	4,245,000	
	23	4,197,500	8,395,000	12,592,500	8,792,500	4,792,500	





PROJECT YEAR	after 1.5 years construction mining year	fill tons mineralized	fill tons non-mineralized	total	I-M fill sites begin off-site sales less 3.8M	total	revise for addl 4M on-site storage
	53	9,672,500	19,345,000	29,017,500	25,217,500	21,217,500	
	54	9,855,000	19,710,000	29,565,000	25,765,000	21,765,000	
	55	10,037,500	20,075,000	30,112,500	26,312,500	22,312,500	
	56	10,220,000	20,440,000	30,660,000	26,860,000	22,860,000	
	57	10,402,500	20,805,000	31,207,500	27,407,500	23,407,500	
	58	10,585,000	21,170,000	31,755,000	27,955,000	23,955,000	
	59	10,767,500	21,535,000	32,302,500	28,502,500	24,502,500	
	60	10,950,000	21,900,000	32,850,000	29,050,000	25,050,000	
	61	11,132,500	22,265,000	33,397,500	29,597,500	25,597,500	
	62	11,315,000	22,630,000	33,945,000	30,145,000	26,145,000	
	63	11,497,500	22,995,000	34,492,500	30,692,500	26,692,500	
	64	11,680,000	23,360,000	35,040,000	31,240,000	27,240,000	
	65	11,862,500	23,725,000	35,587,500	31,787,500	27,787,500	
	66	12,045,000	24,090,000	36,135,000	32,335,000	28,335,000	
	67	12,227,500	24,455,000	36,682,500	32,882,500	28,882,500	
	68	12,410,000	24,820,000	37,230,000	33,430,000	29,430,000	
	69	12,592,500	25,185,000	37,777,500	33,977,500	29,977,500	
	70	12,775,000	25,550,000	38,325,000	34,525,000	30,525,000	
	71	12,957,500	25,915,000	38,872,500	35,072,500	31,072,500	
	72	13,140,000	26,280,000	39,420,000	35,620,000	31,620,000	
	73	13,322,500	26,645,000	39,967,500	36,167,500	32,167,500	
73.5 years of 80 permit begin closure 5 years	74	13,505,000	27,010,000	40,515,000	36,715,000	32,715,000	
permit expires at 78.5 yrs							





## **INDIVIDUAL LETTER 426: KAREN MELQUIST**

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### **Response to Comment Ind 426-1**

The majority of the comment expresses a general opinion that the commenter had trouble tracking “the dirt” in the DEIR, but does not provide specific examples that would allow for a detailed response. The Project Description chapter of the DEIR provides a detailed description of the proposed engineered fill piles, including exhibits showing cross-sections.

The commenter points out that the additive tonnage of engineered fill at the Brunswick and Centennial Industrial Sites under the proposed project scenario, would total 3.8 million tons, whereas the total tonnage of engineered fill for Alternatives 2 and 3 appears to equal 4 million tons. This is a correct observation; however, it does not present an inconsistency for the following reasons. The conceptual design for the alternatives is not meant to be such that the sum of engineered fill from Alternative 2 and Alternative 3 equates to the total fill under the project scenario. For example, under Alternative 3 (Expansion of Centennial Fill Pile and Elimination of Brunswick Fill Pile), the additional tonnage to be accommodated at Centennial is 2.3 million tons, whereas the Brunswick Industrial Site would accommodate 2.2 million tons. Rather than design Alternative 3 to accommodate 2.2 million tons of additional engineered fill, it was determined that the dimensions of the Centennial Industrial Site could reasonably accommodate up to 2.3 million additional tons. Seen in this way, there is no inconsistency in the DEIR.

### **Response to Comment Ind 426-2**

Please see Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets. The commenter’s suggestions that OHV crowd will come from miles away is speculative; further, both the engineered fill piles at the Brunswick and Centennial Industrial Sites will be fenced. This portion of the comment is speculative, and CEQA does not require that an EIR analyze speculative impacts. As stated in CEQA Guidelines Section 15384, “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.”

The commenter states there is no closure plan. However, the project requires an approved Reclamation plan. To ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The Project Applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation’s approved Plan. The commenter is referred to page 4.6-24 and Appendix C of the DEIR.

The commenter asks that the DEIR refer to engineered fill as “dirt”. Referring to rock and sand tailings (engineered fill) as “dirt” would not affect the analysis of project impacts.

### **Response to Comment Ind 426-3**

The commenter suggests that the Union Hill Mine may have hydraulic connection to the Idaho-Maryland Mine and flooding may result. The Union Hill mine is discussed in Section 3.3.3.4 of Appendix K.2 of the DEIR. The Union Hill mine is a smaller mine than the others in the project area. It was closed in 1918 and has been flooded with water since that time. The Union Hill mine



is not connected to any of the other underground mine workings in the area but is in close proximity to the workings of the Brunswick Mine. On April 17, 2019, the water level in the Union Hill shaft was 165 feet higher than the water level in the New Brunswick shaft. The Union Hill mine workings are within 95 feet to 180 feet of workings of the Brunswick Mine at three to four different levels. The Brunswick mine tunnels in proximity of Union Hill were constructed around 1950. During the post WWII period, the combined Idaho-Maryland Mine workings were completely dewatered. In 1956, the water level at the Union Hill Mine was reported to be within 20 feet of the top of the shaft, suggesting that the complete dewatering of the adjacent mine workings resulted in no more than 10 to 20 feet of water level decline in the Union Hill Mine. A “conduit” has not formed between the mines in the previous 70 years, which included active mine operations, as evidenced by the different observed water levels.

#### **Response to Comment Ind 426-4**

The DEIR, in accordance with CEQA Guidelines Appendix G, evaluates the proposed project’s potential impacts associated with being located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or be located on expansive soil under Impact 4.6-3, which starts on page 4.6-41. As discussed therein within the discussion of potential impacts related to collapse, the potential for collapse of existing near-surface mine features as a result of the proposed project is not the same as “sink holes” that occur within limestone environments where a gaping hole forms that may be tens or even hundreds of feet across. As such, the DEIR addresses the commenter’s concerns related to sink holes. Please also see Master Response 29 – Near Surface Workings.

Please also see Master Response 7 – Location of Future Mining Areas. As stated therein, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps A101, A201 and A202 in Appendix A to this Final EIR).

#### **Response to Comment Ind 426-5**

Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. In addition, a revised Well Mitigation Plan has been prepared and is attached to this Final EIR as Appendix D.

#### **Response to Comment Ind 426-6**

Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

#### **Response to Comment Ind 426-7**

The commenter raises concerns regarding the market demand for industrial acreage. Market analysis is not required for an EIR. In addition, future industrial use of the sites would only occur after reclamation and future planning and environmental review. The demand for industrial acreage in 80 years is speculative.

The commenter’s concern regarding funding is noted, but these are considerations outside the scope of CEQA. Please see Master Responses 1, 2, and 4. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



The commenter states the DEIR is missing a “Qualified Engineer analysis for Brunswick and Centennial sites.” Numerous reports and analysis, including geotechnical and other areas, have been conducted for the Brunswick and Centennial Industrial Sites. The commenter is referred to Chapter 4 of the DEIR.

**Response to Comment Ind 426-8**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 427

Dist 3

RECEIVED

Nevada County Board of Supervisors  
950 Maidu Avenue, Suite 200  
Nevada City, CA, 95959

MAR 18 2022  
NEVADA COUNTY  
BOARD OF SUPERVISORS

Date: 3-15-2022

Ind 427-1

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I work/own a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

I have listened to both sides of the argument and find the Rise Gold Corp. (RYES) reports and advertising to be inaccurate. They fail to adequately mitigate many significant negative impacts of this large industrial project on my community and business. It is in my business and personal interest that you do not approve this project.

Ind 427-2

My business's opposition to this project is based on RYES plans, reports and the DEIR (Draft Environmental Impact Report). Experts have reported to me that there will be significant increases in air pollution, traffic in key areas, noise from both above and below ground operations, wildfire evacuation blockages, reduction of our community's water resources, etc. They also report that any economic gains do not justify the costs to the County. Adding 312 jobs to the County workforce of approximately 44,000 is trivial no matter what the wages, and well-paying jobs will not go to County residents.

Businesses depend upon a quality living experience for residents and visitors alike. I am especially concerned about tourism, likely the largest single public industry in the County. Huge diesel trucks and machines spewing exhaust and using key access roads to Grass Valley are not going to improve our vital image as a tourist destination.

Many tourists come here for the outdoors, art, food and wine, and live performances. Please do not permit the County's attractive environment to be damaged by air and noise pollution, a large factory, waste dumps, and industrial traffic.

Sincerely,

Business Name: *Eashbridge Apartments*

Individual Name: *Karin Planeroff*

Address: *85 Rockwood Dr.*

Phone number: *530-272-1888*

Email: *P.S. I manage an 80 unit Senior complex with disabled and frail Seniors. which is a sizable responsibility. So I am speaking for a lot of people. Please don't open this mine.*



## **INDIVIDUAL LETTER 427: KARIN DAVENPORT**

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### **Response to Comment Ind 427-1**

Please see Master Responses 1 and 2. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.

### **Response to Comment Ind 427-2**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.





**Individual Letter 428**

**From:** [karolynrenee](#)  
**To:** [bcbsupervisors](#)  
**Subject:** Stop the mine project  
**Date:** Monday, January 17, 2022 7:19:12 AM

Dist 3

**CAUTION:** This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**Ind 428-1**

Protect our community, do not allow this mine to open!

Sincerely,  
Karri Knowles



## **INDIVIDUAL LETTER 428: KARRI KNOWLES**

---

### **Response to Comment Ind 428-1**

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 429

3/8/22

Dear Mr. Kelley and Board of Supervisors,

Ind 429-1

I am strongly opposed to the proposed re-opening of the Idaho-Maryland Mine by Rise Gold. The community clearly does not embrace this project for numerous reasons, environmental as well as financial.

Please listen to us and do not approve this disasterous project.

Thank you,

Kate Frame  
KATE FRAME

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NEVADA COUNTY  
PLANNING DEPARTMENT

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MAR 03 2022  
NEVADA COUNTY  
PLANNING DEPARTMENT



## **INDIVIDUAL LETTER 429: KATE FRAME**

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### **Response to Comment Ind 429-1**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 430**

Nevada County Board of Supervisors  
Eric Rood Administrative Center  
950 Maidu Avenue  
Nevada City, CA 95959

Mar 21, 2022

**Subject: Comments on the Idaho Maryland Mine Project and DEIR**

Dear Nevada County Board of Supervisors,

**Ind 430-1**

My name is Kate Gazzo. I am a resident of District 1 and live in Nevada City and work in Grass Valley for a nonprofit conservation organization. I have worked in environmental consulting, water quality, and natural resource mitigation for the past ten years since arriving in California. I have a M.S. degree in Environmental Management from the University of San Francisco.

**Ind 430-2**

In reviewing the DEIR, I found three major errors which need revision.

1. The Less Than Significant impacts conclusion on protected species and sensitive natural communities is unfounded and needs to be re-examined which I discuss further below.

**Ind 430-3**

2. The Hydrology study and Wolf Creek Technical Memo fail to present surface water quality data. Without baseline surface water quality data taken from South Fork Wolf Creek prior to the mine opening, there will be no data to compare changes in water quality once the mine begins operations. These data should be collected and disclosed to the public.

**Ind 430-4**

3. The DEIR lacks an economic evaluation of physical impacts posed by the Project from mining waste/spoils, noise, traffic, visual resources, water, and air pollution. The economic impacts of a project are only subject to CEQA if those impacts cause physical impacts, which the Project will.

**Ind 430-5**

My first comment is in response to the unfounded "Less than Significant" Impacts conclusion on sensitive natural communities and protected species. Increased flows and changes in the hydrology and hydroperiod of South Fork Wolf Creek will affect terrestrial, riparian and aquatic communities downstream. How much or how little water in a system impacts the vegetation communities that are present along the creek and therefore, what wildlife uses or does not use those areas. There are protected State and Federally-listed species with known occurrences just downstream of the Brunswick mine site, such as the Endangered Willow flycatcher bird, which relies on the riparian cover, primarily willows, along South Fork Wolf Creek. The willow





	<p>flycatcher and at least two other CESA-listed species have been documented two miles downstream of the Brunswick mine. The riparian band of vegetation along South Fork Wolf Creek will change in response to increased flows from mine dewatering. These impacts have not been analyzed or included in the DEIR. The geographic scope of the biological evaluations for vegetation and wildlife is too narrow and needs to be expanded to the creek corridor of South Fork Wolf Creek and its aquatic and biological communities which will be impacted by increased flows and changes in water chemistry from mine dewatering. Changes in water chemistry including specific conductivity, pH, turbidity and heavy metal contaminants will also affect biota directly downstream of the mine from benthic macroinvertebrates—the base of the food chain in South Fork Wolf Creek, to larger species such as brown trout which are present in the creek. These impacts are not evaluated and need to be included.</p>
<b>Ind 430-6</b>	<p>Regarding impacts on hydrology and water quality in South Fork Wolf Creek, there is no baseline surface water quality monitoring data presented in the DEIR, to make the determination that the Project will have Less than Significant Impacts.. Without baseline surface water quality data, we will not be able to track changes in constituents of concern such as turbidity or heavy metals over time to know if they are mine-related or were always present. Similarly, there is not an assessment on how the water levels and hydroperiod will change in South Fork Wolf Creek and how that will impact downstream habitats and wildlife. These need analysis.</p>
<b>Ind 430-7</b>	<p>My third comment about the DEIR is that the report lacks an economic evaluation. The economic impacts of a project are only subject to CEQA if those impacts cause physical impacts, which the Project will. There will be visual, noise, traffic, mining spoils/waste, and air and water quality impacts on the environment surrounding and downstream of the mine which will impact current residents, and future residents thinking about living in our community in addition to visitors considering coming to Grass Valley for recreation. The appearance of an operating mine as seen from the roadway, poor air quality, noise, traffic, and potential water contamination would likely deter numerous people from choosing to buy a home in the Grass Valley Area. The same argument can be said for visitors. Many would choose somewhere else to vacation that is not encumbered by pollution. This would impact business owners, realtors, and residents (home prices). Additionally, there is no evaluation of cleanup costs from surface mining spoils/waste, water, or air that citizens may be encumbered with. These economic impacts need analysis and inclusion in the DEIR.</p>



Below I put together a simple table with some of the costs of opening the IMM mine paired with the benefits. This is a crude analysis and actual monetary values (an economic study) are needed in the DEIR which is something that is lacking.

Cost	Likelihood	Benefit	Likelihood
Fewer visitors and a less desirable place to live (home prices) stemming from air, traffic, noise, and water pollution impacts	Certain	Creation of local jobs (many may be outsourced)	Uncertain
Mining spoils cleanup and site reclamation. This could be taxpayers responsible for this if you consider the Track Record of Rise Gold Corp	Likely	No additional benefits	
Increased noise for local residents leading to residents leaving the area, and property prices decreasing	Certain	Economic stimulation from more workforce in the community	Certain
Local air quality impacts leading to acute and chronic health impacts for residents from dust and greenhouse gas particulate matter released during operations and trucking	Certain	No additional benefits	
Traffic flows and congestion	Certain	No additional benefits	
Water storage and security impacts to local groundwater table and nearby resident's wells	Certain	No additional benefits	
Surface water quality impacts (turbidity, iron, manganese, others) and impacts on aquatic life	Certain	No additional benefits	
Downstream hydrology impacts on habitats and wildlife along South Fork Wolf Creek	Likely	No additional benefits	

Ind 430-8



**Ind 420-9**

The Project garners very minimal benefit other than a few local jobs. Most people in our area do not have the technical expertise to dewater and operate a mine, therefore, very few local residents will likely obtain jobs from the IMM and most will be from other states. The few millions of dollars stemming from local job creation and local business spending severely underweighs the likely more than a billion dollars of losses in tourism, home prices, human health and environmental costs associated with opening this mine. Many of these impacts are irreversible impacts and ones that we can't simply "cleanup" such as the perception of our cities or contaminated water and sediment. There are so many other great business opportunities and needs of the Grass Valley community than a mine where all profits are going into the pockets of a corporation and only a small fraction back into the community.

I request that the Board of Supervisors thoroughly consider all the costs associated with this Project compared with the benefits which includes an economic evaluation to weigh the costs and benefits of the Project. I also recommend that the hydrology and water quality evaluation be revised to include background surface water quality samples from South Fork Wolf Creek. I request that the protected species and natural communities determination of "Less than Significant" be re-evaluated to encompass sensitive natural communities such as the Bennett Street Grasslands and CESA-protected species that occur in South Fork Wolf Creek directly downstream from the Project.

Sincerely,

Kate Gazzo, M.S.



## **INDIVIDUAL LETTER 430: KATE GAZZO**

---

### **Response to Comment Ind 430-1**

This comment is introductory in nature and does not address the adequacy of the DEIR. The comment is noted.

### **Response to Comment Ind 430-2**

The commenter states the DEIR's conclusions needs to be reexamined. Responses to specific comments are provided below.

### **Response to Comment Ind 430-3**

The commenter states that the Hydrology study and Wolf Creek Technical Memo fail to present surface water quality data. Contrary to the assertions in this comment, the DEIR contains voluminous baseline surface water quality data. The baseline surface water quality data are described in Section 3.4.1.2 and presented in Tables 3.5 through 3.10 of Appendix K.2 of the DEIR. The baseline data include results from samples collected from the underground workings, from drains that discharge water from the underground workings, from Wolf Creek, and from South Fork Wolf Creek. The results include field parameters, general water chemistry parameters, and metals. In particular, Table 3-8 of Appendix K.2 contains pH, temperature, dissolved oxygen (DO), electrical conductivity, and oxidation-reduction potential (ORP) measurements from three locations along South Fork Wolf Creek and two locations on the former SPI site that discharge to South Fork Wolf Creek. Table 3-8 of Appendix K.2 presents laboratory analytical results for 18 general water chemistry parameters and 19 different metals from two samples collected along South Fork Wolf Creek at locations that will be upstream and downstream of the proposed treated water discharge location.

Table 3-10 of Appendix K.2 provides field measurements of flow, temperature, specific conductance, pH, and turbidity for two locations (upstream and downstream) along South Fork Wolf Creek measured during five different storm flow conditions, including summer baseflow, early-season post-storm (comparable to first-flush) flows, winter baseflow, rising flows during a "qualifying rain event of 1.25 inches, and peak flows during the same "qualifying rain event". Additional details regarding flow conditions and baseline water quality conditions in South Fork Wolf Creek are also provided in Appendix K.1 of the DEIR.

Further, analysis of the baseline water quality data is provided in Section 3.4.2 of Appendix K.2 of the DEIR. In particular, data from South Fork Wolf Creek are presented on Figures 3-12 and 3-19, while the baseline data from the underground workings, drains, and Wolf Creek are presented on Figures 3-12 through 3-18.

Compliance with water quality standards, including parameters such as temperature, turbidity, pH, and dissolved oxygen, and also general chemistry and metals, will be based on comparison of the results from the upstream and downstream sample locations while treated water discharge to South Fork Wolf Creek is actually taking place, and not on current baseline conditions. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek and NPDES CAG99500 (provided below). While the baseline sampling that has been conducted for the project informs the analysis of potential impacts in the DEIR, it would not be relevant for future compliance once dewatering, water treatment, and discharge begin. The compliance sampling requirements would be defined in the Monitoring and Reporting Program for the NPDES permit to be issued by the Regional Water Quality Control Board.



[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/5-2022-0006\\_npdes.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/5-2022-0006_npdes.pdf)

#### **Response to Comment Ind 430-4**

The commenter states that the DEIR must include an economic evaluation because the economic impacts of the project will lead to adverse physical changes but provides no evidence to substantiate this claim. CEQA provides that the economic and social impacts of a project are not to be treated as significant effects on the environment. (*Save Our Schools v. Barstow Unified School District Board of Education* (2015) 240 Cal. App. 4th 128, 146.) An economic or social change is to be considered only to the extent it will lead directly or indirectly to an adverse physical change. (*Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal. App. 4th 1184.)

In *Bakersfield Citizens for Local Control v. City of Bakersfield*, the court described the phenomenon [urban decay] as “a chain reaction of store closures and long-term vacancies, ultimately destroying existing neighborhoods and leaving decaying shells in their wake.” The court also discussed prior case law that addressed the potential for large retail projects to cause “physical deterioration of [a] downtown area” or “a general deterioration of [a] downtown area.” (Id. at pp. 1206, 1207). When looking at the phenomenon of urban decay, it is also helpful to note economic impacts that do not constitute urban decay. For example, a vacant building is not urban decay, even if the building were to be vacant over a relatively long time. Similarly, in the context of retail development, even a number of empty storefronts would not constitute urban decay.

The commenter provides no evidence as to how the economic changes of the project will directly or indirectly lead to adverse physical changes akin to urban decay. The commenter is also referred to Master Response 2 - Social and Economic Impacts.

#### **Response to Comment Ind 430-5**

The commenter states that the DEIR is inadequate because increased flows to South Fork Wolf Creek will impact species downstream. The commenter also states that the geographic scope of the biological impacts along South Fork Wolf Creek must be expanded. The commenter is referred to Master Response 30 - Biological Study Technical Adequacy, Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependent Vegetation, Master Response 34 - Resident Fish, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 37 – Birds and Raptors. Please also see Response to Comment Grp 2-5, which demonstrates that the project would not affect vegetation adjacent to the creek or interrelated habitat.

#### **Response to Comment Ind 430-6**

The commenter reiterates the erroneous assertion that the DEIR contains no baseline data to evaluate the hydrology and water quality of South Fork Wolf Creek. The commenter is referred to Responses to Comments Ind 430-3 and 430-5.

#### **Response to Comment Ind 430-7**

The commenter reiterates the assertion that the project’s economic impacts will cause adverse physical changes and thus must be considered by the DEIR. The commenter states that the project’s physical impacts (e.g., aesthetics, traffic, noise) will adversely impact recreation or tourism and would deter would-be future residents from purchasing a home in the community. The commenter is describing potential economic impacts that may result from the project’s





physical impacts. The commenter does not identify any physical impacts that would result from project's economic impacts. The commenter is referred to Response to Comment Ind 430-4, Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

**Response to Comment Ind 430-8**

The commenter states that the project's economic benefits to the community are outweighed by the project's environmental impacts. The commenter is referred Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

**Response to Comment Ind 430-9**

The commenter summarizes the concerns previously listed in the Letter. The commenter is referred to the Responses to Comments above.

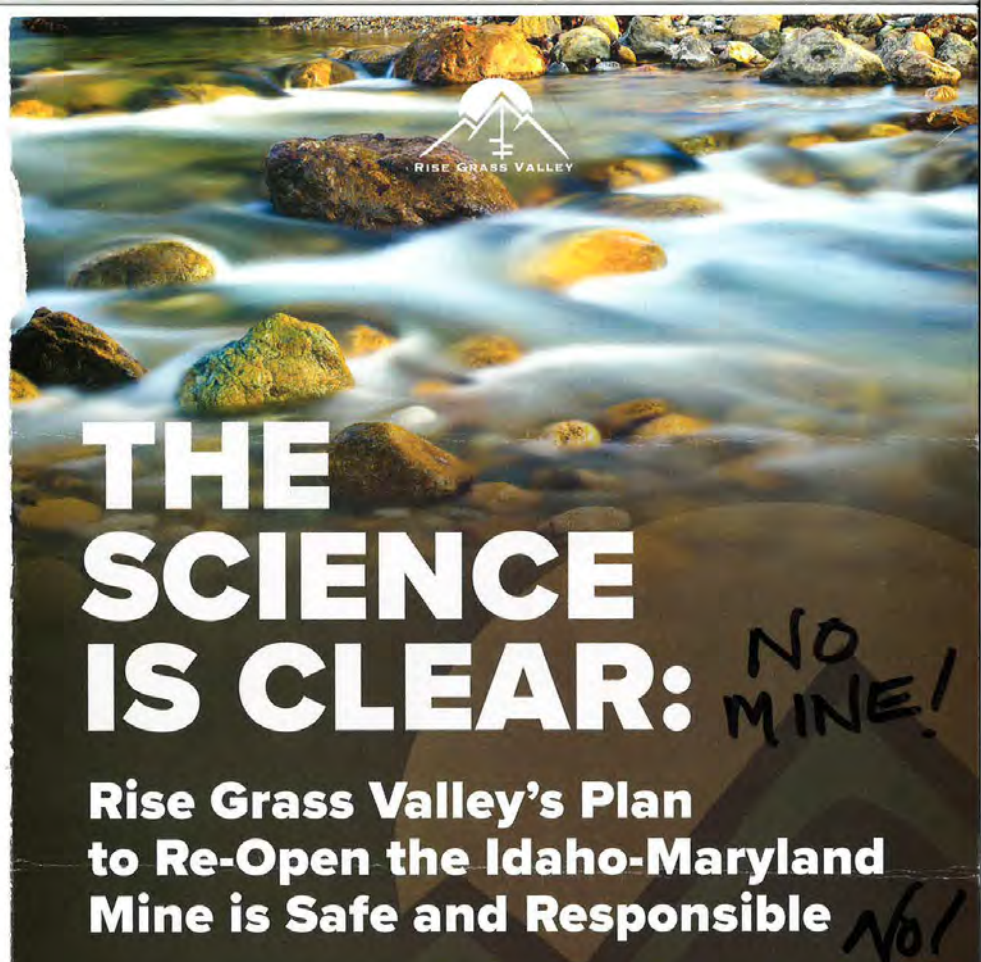


Individual Letter 431

Ind  
431-1



Ind 431-1







## Rise Grass Valley strikes deal with Ophir Hill and Nevada County to bolster local fire protection.

In a major boost to local fire protection, Rise Grass Valley has committed to purchase a new, top-of-line fire engine to serve the Ophir Hill Fire Protection District and to fund three new full-time firefighter positions. Plus, Rise Grass Valley will pay for installation of a new water supply line along East Bennett that will provide fire hydrant access

for the OHFPD. Rise's mine rescue team, with 24 members and five emergency technicians, will be available to OHFPD if needed. The Brunswick site may be used as a base for marshalling of fire resources – with 21 acres of unused area, a changing/shower facility and a backup power system – in the event of a local or regional fire emergency.



The mine would create an estimated 612 new local jobs comprised of 312 mine employees and 300 jobs induced by new local annual spending of ~\$50 million per year.

Rise estimates workers will earn an average of \$122,000 per year including benefits, that's more than double the county average. Local hiring and training programs are designed to achieve the goal that 2/3 of our workers will be recruited from current residents in the area. That's why we're investing so heavily in the Nevada County community – Nevada County residents will be the backbone of our team.

The project provides safe and satisfying careers with exceptional opportunity for skills and knowledge development.

**Over 600 new local jobs created. \$50 million of new local annual spending in Nevada County.**

*I call BS*

Ind  
431-2



## **INDIVIDUAL LETTER 431: KATE KANE**

---

### **Response to Comment Ind 431-1**

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment does not address the adequacy of the DEIR.

### **Response to Comment Ind 431-2**

Please see Master Responses 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 432**

**From:** Katharine Popenuk <popenuk@gmail.com>  
**Sent:** Monday, April 4, 2022 4:30 PM  
**To:** Idaho MMEIR  
**Subject:** DEIR shortcomings-against mine reopening

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**Ind 432-1**

My name is Katharine Popenuk and I reside in Grandview Terrace.

I wish to address whether a specific business, the gold mining business, as opposed to any other business, is in the best interest of the citizens of Nevada County.

We are talking about the real and potential environmental impact of a heavy industrial hard rock mining operation. And we're talking about 80 years. 80 years of 24/7 mine operation, of listening to rumbling below our homes, the thunder of trucks carrying waste rock down our streets. 80 years of breathing microscopic asbestos dust, listening to the non stop crushing mill, driveing on destroyed roads, watching habitats disappear and our natural beauty fade.

**Ind 432-2**

Where in the DEIR do they say how this microscopic asbestos will be filtered out when even a N95 mask is ineffective? Where in the DEIR do they talk about repairs to public roadways ruined by non-stop truck traffic of tons of rock? Where does it address damage to our local highways when the dump sites are filled to capacity or when they find a buyer for the rock fill they will be creating?

**Ind 432-3**

These deeply buried rocks will be stored in a gigantic 37 acre pile, up to 70' high. They also contain naturally occurring sulfide. When sulfide combines with rain sulfuric acid is created. Contaminating our groundwater. Where in the DEIR do they mention how they will stop this from happening? Sulfuric acid will taint our most important water source.

**Ind 432-4**

What will be left of South Wolf Creek and Bennett Meadow after it is blasted every day for the first six months with 15 1/2 Grass Valley municipal swimming pools worth of water? Where in the DEIR do they discuss the potential flooding of Bennett meadow and the resultant killing of the native grasses, and habitat destruction to the many birds and other animals that live there?

**Ind 432-5**

Can we really expect our water table to NOT deplete when 1.6 million gallons of water are being pumped out each and every day? Do they have any better plans than those described in the DEIR than to pipe in water for only 7-30 potential wells gone dry?

**Ind 432-6**

Who will take responsibility when Mr. Mossman or whoever runs "Rise Gold" next, have long since left or declared bankruptcy?

**We, the people, assume all the risk while others, with no interest in our quality of life, leave with all the gold.**



No one can do whatever they want on their own land. All private property rights are subject to laws and codes. Our Board of Supervisors is responsible for ensuring those objectives are met and the community is protected.

I encourage each board member to consider your allegiance to the citizens you have been elected to protect.

Most Sincerely,  
Katharine Popenuk  
10728 Footwall Drive  
Grass Valley, CA.  
808 280-6921

**Katharine Popenuk, Architect**

• Phone 808 280-6921 • [popenuk@gmail.com](mailto:popenuk@gmail.com)



## **INDIVIDUAL LETTER 432: KATHARINE POPENUK**

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### **Response to Comment Ind 432-1**

The commenter is generally opposed to the project and cites a number of potential impacts including noise, traffic, air quality, damage to roads, and adverse impacts to habitat. The DEIR states that noise-related impacts will be less than significant after mitigation, with one exception – temporary construction noise. Specifically, the installation of a potable water pipeline along East Bennett Road will cause a temporary noise impact that is significant and unavoidable. (DEIR, p. 4.10-27, 31.) As noted on page 4.10-44 of the DEIR, using average blasting noise levels from a comparable underground gold mine, the worst-case maximum noise levels at the nearest noise-sensitive receptors would range from 52 to 57 dBA  $L_{max}$ . The range of predicted worst-case blasting noise levels of 52 to 57 dBA  $L_{max}$  is below the daytime, evening, and nighttime dBA  $L_{max}$  criteria at the nearest receptors. For clarification, there is no crushing mill, as envisioned by the commenter. Rather, the fully enclosed process plant building would include grinding equipment for mineralized rock. The noise study for the project evaluated the potential noise impacts from this grinding equipment (DEIR, p. 4.10-38). Based on the data, the mineral processing operations would generate noise levels below the applicable nighttime standards of significance at each of the nearest sensitive receptor locations. As such, noise-related impacts from mineral processing would be less than significant (DEIR, p. 4.10-38).

The DEIR states that air quality impacts would be less than significant after mitigation. (DEIR, p. 4.3-66.) The commenter is also referred to Master Response 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criterion Pollution Thresholds during Operations. The DEIR states that any impacts to habitat would be less than significant after mitigation. (DEIR, p. 4.4-80.) Lastly, the Project Applicant would be required to enter into agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road. (DEIR, Mitigation Measure 4.12-6(c).)

### **Response to Comment Ind 432-2**

The commenter asks how asbestos will be filtered during project operations. Please see Response to Comment Grp 7-6.

Regarding the potential damage to pavement from project traffic, Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

### **Response to Comment Ind 432-3**

The commenter states that the engineered fill contains sulfide, which will produce sulfuric acid during a weather event and pollute groundwater. Please see Master Response 8 – Mine Waste Characterization. Based on the geology of the rock encountered in the core drilling at the project site, and testing of those samples, acid rock drainage is not expected. (DEIR p. 4.8-50.) Nonetheless, the DEIR has concluded that the project may have a potentially significant impact on water quality and has identified Mitigation Measures 4.8-1(d) and 4.8-1(e) to address these



potential impacts and reduce the impact to less than significant. The purpose of the Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board is to ensure the effluent from mine waste does not impact water quality. Further testing will be required as part of the RoWD and WDR process as required by Mitigation Measures 4.8-1(d) and 4.8-1(e) such that any impacts will be mitigated. WDRs for the project will require monitoring and reporting to ensure compliance.

#### **Response to Comment Ind 432-4**

The commenter is concerned with the potential flooding of Bennett Meadow and biological impacts to species and habitat. The DEIR states that the project would not result in flooding on- or off-site and impacts would be less than significant after mitigation. (DEIR, p.4.8-69.) The commenter is also referred to Master Response 36 - Flows in South Fork Wolf Creek. The DEIR's drainage analysis concludes that the project would not significantly alter the drainage patterns of the sites in a manner which would result in substantial erosion or siltation on- or off-site, nor substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, nor create or contribute to runoff water which would exceed the capacity of existing stormwater drainage systems, nor impede or redirect flood flows. (DEIR, p. 4.8-75.) West Yost's independent peer review concurs with this conclusion. Regarding the impacts to habitat and species, the DEIR states that any impacts to habitat would be less than significant after mitigation. (DEIR, p. 4.4-80.) The commenter is also referred to Master Response 37 – Birds and Raptors, Master Response 38 – Foothill Yellow Legged Frog and California Red Legged Frog, and Response to Comment Grp 2-5.

#### **Response to Comment Ind 432-5**

The commenter is concerned about the project's impact on groundwater supplies. The commenter is referred to Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

#### **Response to Comment Ind 432-6**

This comment concerns the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.





**Individual Letter 433**

**From:** Katherine Plocharczyk <katherineplocharczyk@gmail.com>  
**Sent:** Monday, April 4, 2022 12:19 PM  
**To:** Idaho MMEIR  
**Subject:** Comment on the Draft Environmental Impact Report

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**Ind 433-1**

County Planning Commissioners,

I am writing to let you know that I object to the proposed re-opening of the Idaho Maryland mine. I am a Nevada County resident, and I have been for seven years. I urge you to protect not only the natural beauty in Nevada County, but the quality of life for its residents.

There is little evidence that re-opening the mine will bring financial benefit to the community. Rise Gold, the company intending to re-open the mine, has never opened a mine and never made a profit. Their CEO, Benjamin Mossman's, last project went bankrupt, and resulted in a toxic spill that polluted tribal waters in British Columbia. The mine left a huge mess for Canadians to clean up.

**Ind 433-2**

The chances are unlikely that Rise Gold's new venture in Nevada County will be lucrative, and even so, such potential profits will be going directly to Rise Gold shareholders instead of the local community. There is the promise of creating jobs, but these appear few and far between. What we do know is that despite these few job gains, the mine will threaten both tourism and property values by diminishing the quality of life in Nevada County.

**Ind 433-3**

While there is little evidence that the mine will benefit the local economy, there is an abundance of evidence that supports the claim that the mine will ultimately diminish quality of life in Nevada County. I have organized a few reasons below. The Idaho-Maryland mine will:

**1. Produce Toxic Waste:**

Hardrock mining is the number one source of toxic waste in the U.S. Nevada county should be very wary of introducing industrial mining into our community, without a clear plan for disposing of toxic waste. Rise Gold is already responsible for the Centennial Mine Site in Grass Valley, which they have failed to clean up, and with Benjamin Mossman's last venture as precedent, it seems unlikely that the waste produced by the Idaho-Maryland mine will see any other fate.

**Ind 433-4**

**2. Diminish Air quality:**

Continuous rock crushing, loading, hauling, unloading, spreading, and compacting also produces an abundance of dust, when the air quality in Nevada County is already worse than we would like. Nevada County already sees chronic lung disease deaths at twice the state average, and we can't afford to increase these numbers.

**Ind 433-5**

**3. Drain our energy:**

The mine requires massive energy usage, approximately 12% of what all Nevada County uses annually, which will strain our power grid. The county has already planned to cut residential power consumption in an effort to curb our carbon footprint, but the proposal of the mine renders such efforts futile.

**Ind 433-6**

**4. Drain our water:**





Not only will the mine drain our energy but it will swallow up our supply of precious water. The mine calls for 3.6 million gallons every day for 6 months and another 1.2 for up to 80 years - flooding creeks, destroying habitat, and putting private 300+ private wells at risk. In a drought, we cannot endanger our water supply in this manner. Water supply for private residences will be at risk, when they have already been threatened by the state drought.

Thank you for your time and for reading my comments.

All the best,  
Katherine Plocharczyk  
Nevada County Resident



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## **INDIVIDUAL LETTER 433: KATHERIN PLOCHARCZYK**

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### **Response to Comment Ind 433-1**

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 433-2**

Please see Master Response 2.

### **Response to Comment Ind 433-3**

Please see Master Responses 3 and 4, as well as Master Responses 8 through 12 and the discussions and analyses in Chapter 4.7, Hazards and Hazardous Materials, of the DEIR. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 433-4**

Please see Master Responses 18 through 23 regarding air quality.

### **Response to Comment Ind 433-5**

Please see the analysis under Impact 4.3-4, which evaluates the proposed project's potential to result in inefficient or wasteful use of energy and starts on page 4.3-86 of the DEIR. Based on the incorporation of various measures, including the applicant's proposed APM-AQ-1 (Exhaust Emission Control) and Tier 4 engines as required by Mitigation Measure 4.3-1(b), the DEIR concludes that the proposed project would not result in an inefficient, wasteful, and unnecessary consumption of energy, and a less-than-significant impact would occur.

### **Response to Comment Ind 433-6**

Please see Master Responses 13 through 16 regarding groundwater. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.



**Individual Letter 434**

March 28, 2022

Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

Subject: Comments on Draft Environmental Impact Report, Idaho-Maryland Mine

**Ind 434-1**

Dear Mr. Kelley and the Board of Supervisors:

My name is Katherine Thompson and I am part of a 5-generation Nevada County family. I reside within a mile of the Idaho-Maryland mine mineral rights area. Also, I was with the U.S. Environmental Protection Agency Office of Inspector General for over a decade.

**Concerns as a resident:** As a resident, I am concerned about the significant impacts of this mining project not only to me, but also to my children and grandchildren, and my grandchildren's children. This is proposed as an 80-year project with significant impacts for generations.

**Ind 434-2**

Our house is near Gold Hill Drive and we can hear and see the school bus barn traffic on East Bennett Road, where Rise Gold proposes to have dozens and dozens of truckloads of waste trucked daily. We are about 3 blocks from the Grass Valley city limits; we have also heard and felt mine blasts. The trucking and blasting noise and resulting air pollution will adversely and directly impact the quality of life in my neighborhood.

My concerns are:

**Ind 434-3**

- Excessive traffic, noise, and air pollution from trucks hauling waste, supplies, and hazardous substances to and from the mine and from underground blasting.

**Ind 434-4**

- Dewatering the underground water supply, impacting not only wells but also the environment dependent upon the groundwater supply.

**Ind 434-5**

- High flows down South Wolf Creek and Wolf Creek, which passes by Hennessy School.

**Ind 434-6**

- Inadequately identified risks including seismic, climate change, and use of hazardous and toxic materials and practices.



Ind 434-7

- Insufficient hydrogeology investigations throughout the project area that could result in dewatering large portions of our underground water supply and adversely impact a large ecosystem.

Ind 434-8

- Vague identification of operations and risks in the entire project area, including the 2,585-acre mineral rights boundary that includes the Brunswick Basin.

The County public meeting on Thursday, March 24, 2022, identified many significant environmental impacts that were not identified, fully identified or mitigated.

Ind 434-9

Rise Gold’s reputation and history as a non-compliant operator is a serious concern to me. As we know, it’s the actions not the words that count. It doesn’t take much research to see Rise Gold has a poor track record.

Given this history and the large population impacted, it is even more critical that the County have the authority, expertise, plans, and resources to effectively monitor this operation. Does the Nevada County have sufficient funds to monitor all significant aspects of this permit and operation? Will we, the taxpayers, be paying for additional staff or contractors for oversight and compliance? If the operator is not in compliance with its permit, how will Nevada County respond?

Ind 434-10

Minimally, permit compliance would involve discharge water sampling, mine waste discharge monitoring, air monitoring, noise monitoring, and safety inspections. What actions will be taken for violations? Will the mine be allowed to continue to operate with repeated violations? Under what conditions can the permit be revoked? Are we accepting Rise Gold’s monitoring suggestions? Are they adequate to protect the community and the environment? The Rise Gold track record should clearly cause pause.

Ind 434-11

**Concerns as a professional.** As mentioned in my introduction, I was with the U.S. EPA Office of Inspector General for over a decade and spent many years evaluating the Superfund program, in addition to wastewater discharge permits. This included evaluations encompassing mine cleanups. A Superfund designation means that the owner has created a serious toxic or hazardous waste that endangers human health or the environment.

Based on my experience and knowledge:

- Mines are significant toxic polluters.





Ind 434-12	<ul style="list-style-type: none"> <li>Fully identifying mining site hydrogeology is very difficult but critical to understanding how mining operations impact groundwater, associated wells and drinking water, and the scope of the impact. There are multiples cases where unknowns in hydrogeology resulted in dewatering wells (e.g. San Juan Ridge Mine, <a href="https://yubariver.org/issues/the-san-juan-ridge-mine/">https://yubariver.org/issues/the-san-juan-ridge-mine/</a>) and extensive contamination of ground water and or surface water (e.g. Sacramento water supplies, Aerojet Superfund site, <a href="https://www.epa.gov/enforcement/case-summary-epa-issues-order-aerojet-general-corporation-superfund-site">https://www.epa.gov/enforcement/case-summary-epa-issues-order-aerojet-general-corporation-superfund-site</a>).</li> </ul>
Ind 434-13	<ul style="list-style-type: none"> <li>Environmental impact reports often fail to consider the cumulative impacts of planned development, are too vague, and propose inadequate mitigation measures.</li> </ul>
Ind 434-14	<ul style="list-style-type: none"> <li>Cleaning up significant pollution from mines is extremely expensive and some cleanups must continue in perpetuity at taxpayer expense.</li> </ul>
Ind 434-15	<ul style="list-style-type: none"> <li>Companies declare bankruptcy to avoid paying for cleanups.</li> </ul>
Ind 434-16	<p>Mines are significant toxic polluters. According to Columbia Climate School, (December 2016), <b>“The EPA’s Toxic Release Inventory indicates that that the metal mining industry is the nation’s most significant toxic polluter, accounting for 40 percent of toxic releases in 2011 with chemicals such as arsenic, lead and mercury.</b> In 2013, the EPA’s superfund budget was only about \$775 million, but the agency had identified 156 mining sites with potential cleanup costs of up to \$24 billion. As of Oct. 3, 2016, the EPA has identified over 1,000 sites as belonging to the National Priorities List, a collection of polluted sites warranting further investigation.” No Federal funding means Nevada County taxpayers would likely be on the hook.</p>
Ind 434-17	<p>Congress passed the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) in 1980 because of the need to cleanup tremendous toxic and hazardous dumps that had been left behind. Initially there was a Superfund trust fund to cleanup these sites.</p> <p>In 1995, the Trust funding was eliminated and EPA went to a ‘polluter pays’ approach that typically includes enforcement orders, negotiation, lawyers and litigation. (<a href="https://www.epa.gov/superfund/superfund-history">https://www.epa.gov/superfund/superfund-history</a>).</p> <p>According to the Sierra Club, the Centennial Industrial site, purchased by Rise Gold for the project, ranked as the top priority California abandoned</p>





mine by the EPA, because proximity to communities and known contamination and physical hazards. “This site is 56 acres with two-thirds of the site covered with tailings from the Idaho-Maryland Mine, which operated until 1956. Though it was much quieter during the war and afterwards, in fact it then closed in the mid 50’s. There is an estimated two hundred and seventy thousand cubic yards of legacy tailings which are toxic, which have to be removed in order to use the site for new dumping or placing new mine waste.” (Barbara Rivenes, Sierra Club, October 2020, <https://www.minewatchmc.org/post/centennial-site-needs-cleanup>). It should be noted that this site has not been cleaned up or listed on the Superfund National Priorities List although full operations ceased in the mid-1950s.

Rise Gold plans to dump an additional 1 million cubic yards of mining waste as this site. (Rivenes, Sierra Club, October 2020). This area has a “severe” erosion hazard potential (DEIR page 4.6-35) and is subject to a cleanup plan.

Hard rock mining sites are frequently Superfund sites or candidates for Superfund. A 2004 report by the U.S. Environmental Protection Agency (EPA) Office of Inspector General (EPA 2004b) identified 63 hard rock mining sites (which do not include coal mining) listed on the National Priorities List (NPL), another 82 that were on Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) but had not yet been listed on the NPL, and 11 potential CERCLIS/NPL sites. (Source: National Academies of Sciences, Engineering, and Medicine. 2005. Superfund and Mining Megasites: Lessons from the Coeur d’Alene River Basin. Washington, DC: The National Academies Press. <https://doi.org/10.17226/11359>.)

In an article entitled, “Why Are Mines Still Polluting, the Money’s Not There,” the Columbia Climate School explained, “companies declaring bankruptcy or restructuring their corporate relationships have exploited the current assurance mechanisms to avoid cleanup costs.”

(<https://news.climate.columbia.edu/2016/12/20/why-are-mines-still-polluting-the-moneys-not-there/>)

In 2019, the United States Court of Appeals for the District of Columbia Circuit upheld an Environmental Protection Agency decision not to instate its proposed rule that would have protected taxpayers from having to foot the bill for costly clean-ups of mining pollution. (Pacific Standard news report, July 2019.)

The Pacific Standard (7/22/19) noted that John Robison, the public lands director with the Idaho Conservation League said this decision highlights the



need for states and communities to take it upon themselves to ask tougher questions about mining and mine designs. "Communities can't rely on the EPA in protecting public health, safety, and taxpayers," Robison says.

In 2020, the University of British Columbia published research on the adequacy of environment assessments, such as EIRs, including those performed in California. It found these environmental impact reviews identified few to no environment impacts important enough to be "significant" for regulators. Of the various mining projects reviewed, only one in British Columbia adequately included a realistic timescale for the ongoing effects of acid mine drainage, which pollutes streams from mining activities.

Ind 434-18

According to the research, many of the reviews failed to consider the cumulative impacts that the development would add to other ongoing problems. "Building a mine in an area, for example, may present new challenges for wildlife already struggling in that area due other threats."

(Wildlife Society, April 2020, <https://wildlife.org/are-environmental-impact-assessments-short-on-science/>).

The same research also found that many of the reviews failed to show an understanding of potential negative impacts. "Many [environmental] assessments are far too vague," the researcher said, adding that almost none of them included specifics about what wildlife population might be affected by a particular project or whether the effects on nearby wildlife may affect the larger population of a species.

The Idaho-Maryland DEIR is no exception. For example, the DEIR states it will operate in a 2,500-acre underground mineral rights area (DEIR page 2-1). But impacts of accessing these mineral rights (blasting and dewatering) in this area are missing or vague. To illustrate, in evaluating noise and vibration impacts (DEIR 4.10), the DEIR focuses around the area around the Brunswick and Centennial sites and one area in between (DEIR 4.10-4).

Ind 434-19

There is no discussion in 4-10 of blasting and dewatering throughout the mineral rights boundary area, to include the Brunswick Basin. What will be the extent, depth, and frequency of the blasting and dewatering? Also missing is the fact that hundreds of buildings (homes, apartment buildings, businesses) have been constructed above the mineral rights area since the 1950s, when mining last occurred.



Ind 434-20

**Conclusion.** Mines are high-risk toxic operations that cause serious damage, leaving toxic waste, dry wells, and both soil and water contamination. One cause is unknowns in complex hydrogeology. These unknowns have resulted in significant impacts like the loss of drinking water supplies and widespread contamination.

Moreover, recent research shows deficiencies in EIRs are common and this EIR is no exception. Unaddressed deficiencies and unidentified risks and operations in this EIR add to the likelihood the project will not operate as described. Nevada County is responsible for mine oversight, which if sufficient, would significantly add to County budget and burden taxpayers.

Nevada County has grown substantially in the last 70 years (since the last hard rock mining) and hundreds of structures and people now reside above the Idaho-Maryland mineral rights area where blasting and dewatering can and will likely occur. Are these structures and the people in them at risk? The DEIR does not inform us about this.

Ind 434-21

The stakes of this project are high. I believe Nevada County must reject the project based on significant risks to our quality of life (including air, water, and environment). If not, it must ask the really tough questions about this operation, get them answered, apply the necessary limits, enact mitigation, and fund stringent oversight of this operation.

This project has to potential to change the trajectory for Nevada County. Will it continue be a beautiful area that attracts and invites visitors, artists, events, outdoor recreation, entrepreneurs, and tech companies? Or will it become an industrial, noisy, polluted mining town with a poor quality of life? I vote for the first option.

Sincerely yours,

Katherine Thompson  
10815 Footwall Drive  
Grass Valley, CA 95945  
916.835.1541  
kathompson111@gmail.com





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## **INDIVIDUAL LETTER 434: KATHERINE THOMPSON**

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### **Response to Comment Ind 434-1**

This comment is introductory in nature. The comment is noted.

### **Response to Comment Ind 434-2**

The commenter is concerned about project trucks travelling on East Bennett Road, noise and vibration impacts from mine blasts, and air pollution from trucks but does not state why the DEIR is inadequate regarding these impacts. The project does not propose any trucking on East Bennett Road. (DEIR, Figure 3-30.) No mine blasting has taken place at the project since the mines were closed in the 1950s. Noise and vibration impacts from the project are analyzed in Chapter 4.10 (Noise and Vibration) of the DEIR and air quality impacts are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR.

### **Response to Comment Ind 434-3**

The commenter is concerned about traffic, noise, air pollution from trucks, transport of hazardous substances, and underground blasting but does not state why the DEIR is inadequate regarding these impacts. Noise from trucks and underground blasting has been analyzed in DEIR Chapter 4.10 (Noise and Vibration) and was found to be less than significant after mitigation. Air emissions from trucks and other equipment was analyzed in DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and is less than significant after mitigation. Hazardous substances are analyzed in DEIR Chapter 4.7 (Hazards and Hazardous Materials). The commenter does not identify which “hazardous substances” they are referring to; thus, a specific response cannot be offered.

### **Response to Comment Ind 434-4**

The commenter is concerned about the project’s impact to groundwater wells but does not state how the DEIR is inadequate in this regard. DEIR Chapter 4.8 (Hydrology and Water Quality) analyzed impacts to domestic wells and groundwater supply, which were determined to be less than significant after mitigation. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 434-5**

The commenter is concerned about discharges to South Fork Wolf Creek. DEIR Chapter 4.8 (Hydrology and Water Quality) analyzed impacts related to flow in South Fork Wolf Creek and determined those impacts to be less than significant after mitigation. The commenter is also referred to Master Response 36 –Flows in South Fork Wolf Creek.

### **Response to Comment Ind 434-6**

The commenter states that risks including seismic, climate change, and use of hazardous and toxic materials and practices are inadequately identified in the DEIR, but provides no further information or evidence. The commenter is referred to Chapters 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), 4.6 (Geology, Soils, and Mineral Resources), 4.7 (Hazards and Hazardous Materials), and 4.8 (Hydrology and Water Quality) of the DEIR. Regarding climate change, please also refer to Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 434-7**

The commenter states that hydrology investigations in the DEIR are insufficient but provides no further information or evidence. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14



- Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

**Response to Comment Ind 434-8**

The commenter states that operations and risks for the project area is only vaguely identified in the DEIR but provides no further information or evidence. The commenter is referred to Chapter 4 of the DEIR and Master Response 7 - Location of Future Mining Areas.

**Response to Comment Ind 434-9**

The commenter references the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

**Response to Comment Ind 434-10**

The commenter references the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

**Response to Comment Ind 434-11**

The commenter is concerned about the project potentially creating toxic mining waste. The commenter is referred to Master Response 9 - Historical Mine Waste at Centennial Site.

**Response to Comment Ind 434-12**

The commenter states that fully understanding mining site hydrogeology is very difficult but does not comment on the project or the adequacy of the DEIR. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

**Response to Comment Ind 434-13**

The commenter states that EIRs often fail to consider cumulative impacts but does not comment on the project nor the adequacy of the DEIR. Cumulative impacts have been analyzed at the end of each technical chapter of the DEIR. The commenter is referred to Chapter 4 and Section 5.3 of the DEIR.

**Response to Comment Ind 434-14**

The commenter states that cleaning up mining sites can be expensive and can continue into perpetuity. This comment does not concern the project nor the adequacy of the DEIR. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) and Appendix C of the DEIR. The commenter is also referred Master Response 8 - Mine Waste Characterization.

**Response to Comment Ind 434-15**

The commenter states that mining companies declare bankruptcy to avoid paying for cleanups. This comment does not concern the project nor the adequacy of the DEIR. The commenter is referred to Appendix C (Reclamation Plan) of the DEIR and Master Response 3 - Operator Responsibility.

**Response to Comment Ind 434-16**

The commenter states that the metal mining industry is a significant toxic polluter. This comment does not concern the project nor the adequacy of the DEIR. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.





### **Response to Comment Ind 434-17**

The commenter references the Centennial Industrial Site. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA, and Master Response 9 – Historical Mine Waste at Centennial Site.

### **Response to Comment Ind 434-18**

The commenter states that the DEIR fails to consider cumulative impacts but provides no additional information. Cumulative impacts have been analyzed in DEIR Chapters 4 and 5.3. The commenter also states that the DEIR understates the project's impacts because the project areas analyzed are the Brunswick and Centennial Industrial Sites, but the mineral rights area consists of 2,500 acres. The commenter is referred to Master Response 7 - Location of Future Mining Areas. The commenter also states that environmental review, such as this DEIR, frequently understates the impacts of the mining waste. The commenter is referred to Master Response 8 - Mine Waste Characterization.

### **Response to Comment Ind 434-19**

The commenter states that there is no discussion of blasting or dewatering throughout the mineral rights boundary area. The commenter is referred to Chapter 4.10 (Noise and Vibration) and Appendix M of the DEIR and Master Response 7 - Location of Future Mining Areas. Regarding the groundwater impacts from dewatering, the commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The commenter also states, in relation to blasting, that numerous structures have been built on the surface since the Idaho-Maryland Mine was last active. Impacts to structures and residents from blasting vibrations has been analyzed in the DEIR. Impacts from blasting vibrations are less than significant after mitigation. The commenter is referred to Chapter 4.10 (Noise and Vibration) and Appendix M of the DEIR and Master Response 7 - Location of Future Mining Areas.

### **Response to Comment Ind 434-20**

The commenter summarizes their previous concerns. Please see the above responses.

### **Response to Comment Ind 434-21**

The commenter urges the County to not approve the project. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.



**Individual Letter 435**

**From:** Kathleen Fenton <kathleenaddress@gmail.com>  
**Sent:** Friday, April 1, 2022 11:04 PM  
**To:** Planning  
**Subject:** comment for Planning Commission on IMM Project

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Dear Planning Commissioners,

You are in the enviable position of being able to actually do something to significantly protect the environment and quality of life here. You are charged with this responsibility and have the public trust, the trust of your community. Please do not let us down by approving the egregious Idaho-Maryland mine project.

Kathleen Fenton  
530 277-9460

**Ind 435-1**



## **INDIVIDUAL LETTER 435: KATHLEEN FENTON**

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### **Response to Comment Ind 435-1**

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





## **INDIVIDUAL LETTER 436: KATHLEEN MADEIRA**

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### **Response to Comment Ind 436-1**

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 437**

**From:** [Kathleen Madeira](#)  
**To:** [BOC Public Comment](#)  
**Subject:** Rise Gold  
**Date:** Monday, February 28, 2022 10:49:14 AM

Dist 3

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[Katharine Popenuk](#) shared a link.

[t48f104c9fph10fgn1sao1reh](#)

**Ind 437-1**

This opinion piece was in the Union today. Unfortunately, they did not print the most up to date version, which is below.

Science is clear but Rise Gold's most recent mailing is anything but. Rather, it is an intentionally misleading attempt to skew the facts regarding the mine reopening.

Has the mine reopening been approved?

No, Nevada County has NOT just completed anything regarding approval of the mine reopening. The county Board of Supervisors has yet to conduct its first meeting to discuss the contents of the draft environmental study. They have not yet fully considered nor approved the contents of the study. No final determination has been made as to the accuracy of the scientific analysis, anticipated impacts, or adequacy of the proposed regulation of a reopened mine.

**Ind 437-2**

The DEIR (DRAFT Environmental Impact Report) has not laid to rest anything. Rather, the report enumerates 83 impacts, 32 of which are considered significant enough that they will require some measure of intervention so as to make them not as bad as they actually are anticipated to be. Some impacts are so severe, there is nothing that can be done, we will just have to live with them. We are being asked to accept a lower quality of life in Grass Valley.

**Ind 437-3**

None of these concerns have been "put to rest". There remains grave concerns about drained wells, spoiled aquifers, polluted water ways, destroyed habitats, dust, exhaust, noise, and airborne chemicals associated with the transportation of waste and by gold extraction. There is no confirmation that there will not be spills, seepage, accidents, oversight, or callous disregard of regulations or safety practices.

**Ind 437-4**

What is the DEIR?

The DEIR's only purpose is to lay out the ways in which the reopened mine will impact our



	<p>environment and the possible ways some of these impacts could be dealt with. This report was compiled for and paid for by Rise Gold. It is important to note that this report was limited by and relied exclusively on information provided to the consulting firm by Rise Gold, and many of the conclusions reached in the report are based on assumptions and best case scenarios. The report does not guarantee in any way what will be the actual outcome. The fact remains, the mining industry is the single largest source of toxic waste and one of the most destructive industries in the country. Today's industrial mining involves the blasting, deep excavating, and crushing of acres of land and the use of huge quantities of toxic chemicals such as cyanide and sulfuric acid.</p>
<b>Ind 437-5</b>	<p>But what about the new jobs?</p> <p>Rise Gold states we can expect 612 new jobs, 312 of which are directly related to the mine operation. The other 300 are presumed to be increases in our current employment base, in response to the estimated 50 million new dollars being poured into our community. Two thirds of the 312 mine employees are to be current local residents. The remaining 104 employees, would be the top paid technical and managerial positions. Are any of these highly trained specialized employees already a part of our local community? Or will these positions more likely be outsourced? Will adding 104 new Grass Valley residents really induce a new local spending increase of \$50M each year?</p>
<b>Ind 437-6</b>	<p>Do mine workers really earn \$122,000 a year?</p> <p>When Rise Gold says "average", they are including all salaries, including the top 1/3 salaried positions in the calculation of that average. This includes the CEO's anticipated very generous salary. Furthermore, Rise Gold's estimated worker earnings includes company-paid benefit costs that the employee never sees in their paycheck. The reality is an entry-level Miner can expect to earn an average total compensation (includes bonus and overtime pay) of \$18.55/hour, based on a survey of typical existing salaries. An early career Miner earns \$20.26, and an experienced Miner with 10-19 years of experience earns \$27.56. (source: <a href="https://www.payscale.com">payscale.com</a>). Truck drivers, janitors, front load operators, security staff, etc. will all be making the current going rate, with or without a mine.</p>
<b>Ind 437-7</b>	<p>Do we get to keep the gold? No, we don't. All of the gold and all of the profits will be leaving Grass Valley. The city of Grass Valley and Nevada County will not be receiving a piece of the gold pie. Any profits will go to the owners and shareholders of Rise Gold.</p>
<b>Ind 437-8</b>	<p>So what's in it for us?</p> <p>That is a very good question. Grass Valley assumes all of the risks, and for what? It's a case of trading the family cow for a handful of magic beans. We would be risking so much for so very little; throwing away our beautiful quiet community, our neighbors, our scenery, our streams and rivers, our air quality, our water quality and habitat, our well paved traffic free streets, our peace and quiet, and our tax dollars for mitigation and reparation—24/7 for the next 80 years; for what?</p>



## **INDIVIDUAL LETTER 437: KATHLEEN MADEIRA**

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### **Response to Comment Ind 437-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 437-2**

The commenter generally summarizes the number of impacts analyzed in the DEIR, but does not address the adequacy. See Master Responses 1 and 2.

### **Response to Comment Ind 437-3**

The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 437-4**

The DEIR has been prepared by a consultant hired and directed by the County. All technical reports used in the DEIR that were prepared by the Project Applicant have been independently peer reviewed by third party consultants hired by the County.

### **Response to Comment Ind 437-5**

Please see Master Response 2.

### **Response to Comment Ind 437-6**

Please see Master Response 2.

### **Response to Comment Ind 437-7**

Please see Master Responses 1 and 2.

### **Response to Comment Ind 437-8**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 438

From: John Peterson (mailto:john.peterson@co.nv.us)  
To: All 2022 Board Members  
Cc: District 3 Board Chair (mailto:John.Peterson@co.nv.us)  
Subject: PE article on the mine  
Date: Tuesday, January 25, 2022, 12:38:08 PM

District 3

From: Kathleen Madjara <tmadjara1@gmail.com>  
Sent: Tuesday, January 25, 2022, 9:39 AM  
To: bobofsupervisors <bobofsupervisors@co.nevada.ca.us>  
Subject: article on the mine

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The Gold Rush Returns to California

*Demand for gold has risen in recent years. Not everyone is happy about that, especially some residents of Grass Valley.*

Top: The site of an abandoned mine near Grass Valley, California, is marked by a weathered concrete silo.

All visuals by BECKI ROBINS for LINDARK

BY BECKI ROBINS

04.01.2022

0 COMMENTS

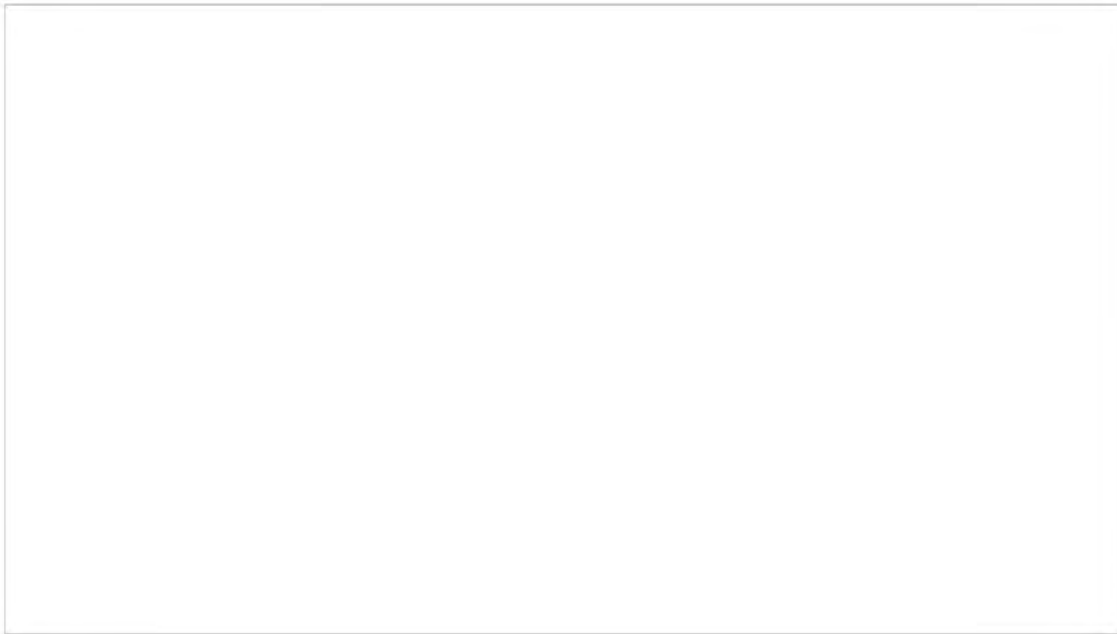
ON THE OUTSKIRTS of the northern California town of Grass Valley, a massive concrete silo looms over the weeds and crumbling pavement. Nearby, unseen, a mine shaft drops 3,400 feet into the earth. These are the remains of Grass Valley's Idaho-Maryland Mine, a relic from the town's gold mining past. Numerous mines like this one once fueled Grass Valley's economy, and today, Gold Rush artifacts are part of the town's character. A stamp mill, once used to break up gold-bearing rock, now guards an intersection on Main Street, and old ore cars and other rusty remnants can be spotted in parking lots and storefronts around town.

Gold still exists in the veins of the abandoned mine, and Rose Gold, the mining corporation that purchased the mine in 2017, has reason to believe that reopening it makes financial sense. When the mine shut down in 1956, it wasn't because the gold was drying up; it was because of economic policy. The 1944 Bretton Woods Agreement had established a new international monetary system to create stability in exchange rates. As part of the effort, the price of gold was fixed at \$35 per ounce. Gold mining became unprofitable in the U.S.

Ind 438-1







RELATED

**The Churchills and the Gold Mine**

Today, the price of gold is no longer fixed, and prices have risen in response to the economic uncertainty wrought by Covid-19. At the start of the pandemic, the Federal Reserve lowered interest rates in an effort to stimulate the U.S. economy and encourage borrowing money. But those record-low rates decreased the returns on bonds and savings accounts, making gold a relatively more attractive business investment.

Now, with inflation rising and renewed economic uncertainty over the economic variant of the coronavirus, demand for gold remains high, even despite some recent price dips. In 2020, roughly 43 percent of gold consumed globally went towards exchange-traded funds and central banks. As prices have risen and mining technology has become more sophisticated, mines are opening and reopening in places where mining was once thought economically unfeasible.

Still, mining isn't as simple as it used to be. The U.S. Geological Survey estimates that of the world's known gold, roughly 63,000 tons are still in the ground, compared with roughly 206,000 tons that have already been mined. And the world's unmined gold is generally only unmined because it's deeper underground and thus less accessible. To obtain it, companies have to figure out what to do with huge amounts of mining waste, some of which contains heavy metals and other toxic substances.

Rise Gold has pledged to mitigate the environmental impact of its new mining operation in part by employing a technique called paste backfilling, which involves injecting a mixture of water, mine waste, and a binder (often cement) into mining tunnels. The practice helps provide structural support and reduce the amount of aboveground mine waste. There is some science to support the benefits of this approach, but it's only a partial solution, and there are lingering uncertainties about its long-term impact. While Rise Gold reports that there is strong support for the project throughout Nevada County, where Grass Valley is located, some local residents remain skeptical. Among other things, they are concerned that the new mining operation will not be able to adequately contain its waste.

Given these challenges, some economists are asking whether it makes sense to mine gold when the precious mineral is merely destined for a bank vault. "The cost of mining is high," says financial economist Dirk Baur. Much of the value of gold is tied up in the cost of just digging it out of the ground, he says. "There's some profit for the mining company, but a big, big chunk is just an expense."

**OVER THE PAST** couple of decades, proposals to develop or expand gold mining facilities have popped up across Europe and North America. In Northern Ireland, Dalradian Gold plans to open a mine in the Sperrin Mountains. In Newfoundland, Marathon Gold is slated to open an open-pit mine that the company says will be the largest gold mining operation in Atlantic Canada. In the United States, which, as of 2020, had the fourth-largest gold mine reserves in the world, mining operations have expanded in northwestern Arizona in recent years, and there are plans to reopen a mine in central Idaho. Many companies seeking to find new riches in old places face community pushback similar to what is happening in Grass Valley.

Gold mine opponents have good reason to be wary. Mining creates a lot of waste, including the rock that doesn't contain enough gold to extract (called "waste rock") and also the slurry left over after gold has been extracted from ore (called "tailings"). Both waste rock and tailings can contain toxic substances that threaten to pollute groundwater and surface waters if not properly mitigated.

Grass Valley has been dealing with the fallout of Gold Rush-era mining for decades. Arsenic, which occurs naturally in the gold deposits of the Sierra Nevada foothills, remains an ongoing problem in the area. Old tailings can still leach heavy metals decades after mining operations have ceased. In Grass Valley, the Central Valley Regional Water Quality Control Board documented high concentrations of arsenic in a pile of tailings nicknamed "the Red Dirt Pile." In 2020, high concentrations of lead, mercury, and arsenic were found in samples taken from a former mine waste disposal area that now supports approximately 4.5 acres of wetland habitat. That disposal area, known as the Centennial site, is owned by a subsidiary of Rise Gold called Rise Grass Valley.

The Centennial site was polluted enough to warrant consideration for listing as a federal Superfund site, but Rise Gold avoided federal regulation by agreeing to undertake its own cleanup. Ralph Silberstein, president of the Community Environmental Advocates Foundation, a local environmental organization, says his group welcomes Rise Gold's plan to address the hazardous substances that currently mar the area. But, he says, the group is troubled by what might come next. According to Rise Grass Valley's Remedial Action Plan, the company may take the freshly cleaned-up site and use it for dumping waste from future mining operations, "though they'll first have to get permission from the state."

**E**

Equipment labeled "Rise Gold Corp" sits at the Centennial site. The area now supports 4.5 acres of wetland habitat and was considered for listing as a federal Superfund site.

Rise Gold's plans to minimize the mine's impact are outlined in a draft environmental impact report, which Nevada County released this month, and which the company describes as "favorable." In an interview with Undark, Rise Gold's CEO, Ben Mossman, defended his company's plan to use the Centennial site for some of the waste produced in conjunction with the reopening of Grass Valley's Idaho-Maryland Mine. This particular mine is unique, said Mossman, because the company found "very little metal content" in the areas where it plans to dig. Because the waste will largely consist of non-toxic materials such as sand and rock, he says, "there's no geochemical concerns to the environment or human health"—a claim that activists question.

Even when rock has little or no heavy metals, disposing of it can be a significant challenge. According to Rise Gold's website, the Idaho-Maryland mining operation historically had to remove a ton of rock for every half ounce of gold it recovered. "These mining companies come along and they want us to not notice that they're going to have a huge amount of mine waste rock," says Elizabeth Martin, who recently retired as CEO of the Sierra Fund, a local conservation group based in nearby Nevada City. Rise Gold's draft environmental impact report says the plan will result in approximately 182,500 tons of material produced per year that will need to be transported then used as engineered fill. By comparison, a large dump truck can carry about 14 tons. Multiply that by more than 10,000, and the visual is "beyond most people's imagination," says Martin.

**RISE GOLD PLANS** to reduce its aboveground footprint at the Grass Valley mine with cemented paste backfill, which was first used in the 1970s as a way to recycle mine materials and help stabilize the underground workings. In essence, the mine becomes safer and the waste goes back to where it came from.

Paste backfilling is widely regarded as a more environmentally friendly way to dispose of mine waste. There is evidence that locking tailings up in cement decreases their permeability and stabilizes any heavy metals within them. There are still questions, though, about whether or not arsenic and heavy metals will stay put in the paste backfill material over the long term. The leaching behavior of arsenic depends on a lot of different factors, including the binder used in the backfill and the chemical content of the tailings. The biggest unknown is what happens in the future, when the mine closes and the pumps shut down, which will let groundwater flow into the backfilled tunnels. Some studies have noted that even low levels of leaching could continue for years, potentially contaminating drinking water or nearby rivers and streams.

"These mining companies come along and they want us to not notice that they're going to have a huge amount of mine waste rock," says Martin.

Heavy metal leaching is high on the list of concerns in Grass Valley. Rise Gold promises their operations will be clean, but even so, the company's hydrology report does not assess arsenic leaching from some test samples. The leaching tests, meant to simulate what might happen at a waste rock pile when it rains, found that arsenic leached at concentrations 17 times greater than the water quality standards from samples of the mineral type serpentinite. Rise says that's not a concern since there will be very little serpentinite in the waste rock. Its report also notes that tests on tailings indicated arsenic leaching, but only at concentrations that would not exceed regulatory limits.

Underground mining operations also intersect with the water table, which means the existing tunnels have to be dewatered, and the water that's pumped out of the tunnels has to be treated before it's released aboveground. "The water coming from these mines that they're dewatering is full of arsenic, manganese, iron, and other heavy metals," says biologist Josie Crawford, executive director of the Wolf Creek Community Alliance, another local group that opposes the mine. "It will be treated, but it needs to be treated forever."

The water also has to go somewhere after it's been treated. Rise Gold plans to flush it down nearby South Fork Wolf Creek, a move that Crawford fears could cause damage to the riparian habitat. "It's a trout stream, so it's sensitive," she says. "If the dewatering starts scouring the creek, they could lose a lot of those invertebrates and ruin the trout habitat."

**CONSERVATIONISTS AND** community opposition groups often see gold mining as a battle between nature and greed, and question whether the pursuit of gold is really worth so much environmental destruction. So does Baur, the financial economist, who says it makes sense from both an environmental and economic perspective to just not mine for gold at all. Much of the gold that already exists above ground, he says, is held by banks and investment companies. Investors can buy shares of gold—they've never even seen Baur says they might as well just buy shares of gold that companies promise to leave in the ground. "You buy something that doesn't disrupt the land as much," he says, "and you don't have all the negative effects of the actual gold mining."

Baur recently explored this idea with a couple of his colleagues at the University of Western Australia Business School. In a 2021 paper, they proposed leaving unmined gold in the ground and letting "nature act as a natural vault and custodian legally protected by gold firms and the government." In this scenario, investors could buy stock in gold exploration companies that have identified underground gold but have no plans to mine it. This would give investors an alternative to purchasing shares of the aboveground gold that currently sits in bank vaults around the globe.

Would the unmined gold, which the paper calls "green gold," actually earn money for its investors? Baur and his coauthors considered the costs of gold exploration and gold mining, and the uncertainty of the quality and amount of gold that might exist in any given underground location. They then ran an empirical analysis, and concluded that unmined gold can still be a valuable investment.

**A**

A sign in the East Bennett neighborhood of Grass Valley reads "NO MINE." Several community groups in the area, concerned about heavy metal pollution and the vast amount of waste rock, are opposed to the mining project.





Basu says his paper has, unsurprisingly, received negative feedback from the gold industry. "They hate the idea, of course," he says. "It's the end of their business, essentially." He thinks investors, though, may be more willing to entertain the idea, especially those who are looking for green investments. "But there's also a lot of greenwashing," he says, adding that investors may say they want to invest green, but may not be as willing to try new ideas when the time comes.

These questions will take time to sort out. In the meantime, the Grass Valley mining project still needs to overcome public opposition and significant financial hurdles. Opening a mine is expensive. Before Rise Gold bought the mineral rights in 2017, EmGold Mining Corporation had plans to reopen the mine. They spent \$1 million just on consultants, according to one estimate, and the project never got past the preliminary stages. Locals like Silberstein hope Rise Gold's plans will meet a similar fate.

"They're talking about bringing gold up from 3,000 feet below the surface," he says, "which means restoring a badly damaged, probably collapsed-in gold mine to get less than an ounce per ton of gold out."

"It doesn't make sense," he adds. "It's not a smart thing to do if we want to have a sustainable, livable world."

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*Becki Roberts lives in California's gold country and writes about science and nature, history, and travel. Her work has appeared in Earth Island Journal, Lonely Planet, and on the YouTube series SciShore.*



## **INDIVIDUAL LETTER 438: KATHLEEN MADEIRA**

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### **Response to Comment Ind 438-1**

The comment provides an article written about the proposed project, but does not address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 439

Kathleen Ogburn  
300 Vistamont Dr  
Grass Valley, CA 95945



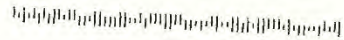
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Planning Commission  
Attn: Brian Foss

950 Maida Ave Ste 170  
PO Box 599002  
Nevada City, CA 95959-1902

95959-790202



Ind 439-1

**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$22,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) \_\_\_\_\_  
Address \_\_\_\_\_ ZIP \_\_\_\_\_  
Phone \_\_\_\_\_  
Email Address \_\_\_\_\_

**NO! NO! NO!**



## **INDIVIDUAL LETTER 439: KATHLEEN OGBURN**

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### **Response to Comment Ind 439-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 440**

January 31, 2022

Matt Kelly, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959



Re: Idaho-Maryland Mine Environmental Impact Report Study Comments

**Ind 440-1**

Dear Mr. Kelly:

This correspondence is in reference to the letter sent allowing the public to provide comments on the Idaho-Maryland Mine Project EIR. I strongly disagree in allowing anyone to reopen the Idaho-Maryland Mine, or any other mine in or near Nevada County. There is no guarantee the problems that can occur due to the opening of the mine will not happen, regardless of the speculative content of the Environmental Impact report. What I see is a lot of rhetoric stating the pollution will not occur for various reasons. I do not see any proof of these words. Where is the example of a clean slate of pollutants after reopening a similar mine? What happened to the water wells in the San Juan Ridge area of Nevada County when mine activity occurred in the past?

**Ind 440-2**

What I don't understand is why Nevada County continues to entertain the idea of reopening mines in the county? There are far too many people in Grass Valley to consider that any mine activity would not grossly interfere with human health, air quality, water quality, noise abatement restrictions, traffic problems, environmental disruptions and road quality problems, etc. Mining within a city is not conducive to a healthy living environment, particularly when Grass Valley has changed considerably since mining originated. This is no longer a city that is developing because a gold mine is in existence. It is a resort-like town that attracts people because of its history and it has remained somewhat quaint due to restoring the old buildings and touting the days of yesteryear.

**Ind 440-3**


The emphasis has been on cleaning up the environment and finding ways to keep pollution and big box stores at bay. It has taken years for all the previous mine work damage to subside. We have enough problems keeping things green and environmentally safe due to climate change and fossil fuel problems. Why would we want to take the chance the previously known environmental problems discussed in the EIR may come to the forefront? This city also has a large number of retired people. These are senior citizens who came here to live out their older years by taking advantage of the clean mountain air, beautiful landscapes and solitude. Many of these people, including my husband who has C.O.P.D./emphysema, have medical issues that would be greatly impaired with any chance of air or environmental quality issues due to reopening the Idaho-Maryland Mine. What a sad state of affairs to create problems for the very people who have helped keep this city alive.

**Ind 440-4**

Even if the anti-pollution efforts in the EIR were found to be correct and not a problem, there is still the issue of a constant stream of dump trucks creating traffic, fumes, noise road destruction and the possible sparking of a fire due to our drought conditions. Water is so scarce in California, it is a poor idea to take the slightest chance that chemicals or





	<p>Page 2 any particulates not natural to everyday life be introduced to our rivers and streams. We don't want to worry about becoming a victim of anything similar to Flint, Michigan. Air quality is already a problem world wide. The particulates are so microscopic it may take years to realize the damage to humans, plants and animals is occurring until it is too late to reverse the problem.</p>
Ind 440-5	<p>Do we really want to take the risk that all the problems the mine reopening could create will actually occur? Is it worth lining the pockets of people from a foreign country, by polluting our small town? I find it unlikely we will solve any employment problems from the reopening of the mine. Many of the jobs require highly qualified personnel. We can't refill the basic jobs from the pre-pandemic times, do you think the labor intensive jobs will be highly sought after? The unskilled jobs will continue to be filled from the poor, less educated, or undocumented people from other cities, states and countries. I predict a very small percentage of local people will gain employment from the reopening of the mine. Once the unskilled workers realize the work is unsavory, the workers will find other ways to make a living. Current residents are not looking for menial, hard labor positions, at least not as a long term job. The pandemic has proven the jobs people prefer are remote, computer oriented jobs.</p>
Ind 440-6	<p>There are no redeeming qualities in opening the Idaho-Maryland Mine or any other mine. If tax revenue is the advantage, it is a poor trade off for making sweeping changes to the city of Grass Valley, creating problems for the current residents of the area. Is the dollar so important that the very people who live in this area may suffer poor health and a polluted environment?</p>
Ind 440-7	<p>My only hope is that the Nevada County Board of Supervisors will think long and hard on voting in favor of the reopening of the Idaho-Maryland Mine. It is hard for me to believe the people who live in this county and have followed the news stories about the mine truly understand the problems that could and will arise due to reopening of this or any mine in our community. If we need revenue let's find a less disruptive method. I'm certain we could do some fund raisers or other ways of gaining funds.</p>
Ind 440-8	<p>Thank you for the opportunity to voice my opinion. I do hope you will consider what I have voiced as pertinent and valid. This is truly a life changing situation for me and for many people in Grass Valley. I would definitely need to make a major change in my retirement location if this mine were to be reopened. It would be extremely difficult and of great consternation.</p> <p>Sincerely, </p> <p>Kathleen Woodson Retired Grass Valley Resident 11547 Brunswick Pines Road Grass Valley, CA 95945</p>



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## **INDIVIDUAL LETTER 440: KATHLEEN WOODSON**

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### **Response to Comment Ind 440-1**

Please see Master Responses 1 and 2.

Pursuant to the requirements set forth by CEQA Guidelines Section 15121, the DEIR assesses all potential project impacts that could occur to all environmental issue areas required for analysis under CEQA. As part of such assessment, the DEIR evaluates the proposed project's consistency with applicable policies, regulations, and standards established at the federal, State, and local levels and incorporates analyses from the County's expert consultants, which includes independent peer review. Where potential impacts are identified, the DEIR sets forth mitigation measures to reduce the severity level of the identified impacts to the extent feasible and discloses the level of impact that would occur subsequent to incorporation of mitigation. As such, the analysis within the DEIR is not speculative. The analysis in the DEIR is adequate and meets the requirements set forth by the CEQA Guidelines. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.

### **Response to Comment Ind 440-2**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 440-3**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Air Quality is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy of the DEIR.

### **Response to Comment Ind 440-4**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding impacts if the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 440-5**

Please see Master Response 2.

### **Response to Comment Ind 440-6**

Please see Master Responses 1 and 2.

### **Response to Comment Ind 440-7**

Please see Master Responses 1 and 2.

### **Response to Comment Ind 440-8**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 441**

April 2, 2022

To: Matt Kelley, Senior Planner

Nevada County Planning Department  
950 Maidu Ave, Suite 170  
Nevada City, CA  
530-265-1423  
[Matt.Kelley@co.nevada.ca.us](mailto:Matt.Kelley@co.nevada.ca.us)  
[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

Attn: Matt Kelley

Please include these comments to the Idaho-Maryland Mine DEIR:

Sierra Streams Institute, a regional watershed science organization located in Nevada City, initiated a project in 2014 entitled, "Community Health Impacts from Mining Exposure, or CHIME." This project was a response to concerned Nevada County residents who asked Sierra Streams to investigate if there was any connection between Nevada County's high breast cancer rate and heavy metals from historical mining still present in the environment. The project was guided by a group of local community members called the community advisory board of whom I was member. (<https://sierrastreamsinstitute.org/research/>)

**Ind 441-1**

The CHIME study was funded by state tobacco taxes through the California Breast Cancer Research Program. It investigated the concentrations of heavy metals, like cadmium and arsenic, in a group of approximately 100 Nevada County women. It not only found interesting links between body burden (the total amount of a particular chemical present in a human's body) and the amount of time living in the area, but was also able to educate the community about the health hazards of heavy metal exposure. The second phase of the study focused on the amount of cadmium and arsenic in the bodies of women with and without breast cancer residing in historical Gold Country.

These two metals are of interest because they are found at high levels throughout the Gold Country, are known carcinogens and may play a role in developing breast cancer. The three most populous counties in the Gold Country, including Nevada County, have breast cancer rates that rank in the top ten counties in California. (<http://cancer-rates.info/ca/>)

According to the DEIR:

"Blasting and crushing would also result in emissions of dust with trace heavy metals TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium and vanadium. Concentrations of each heavy metal within the barren rock and mineralized rock was taken from Table 4-7 of the *Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project* (EMKO Environmental, Inc. 2020)"

**Ind 441-2**

The DEIR fails to respond adequately to how it would mitigate the issue of contaminated soil and dust. This is of great concern given that the CHIME study has already shown that there is an increase in the risk of cancer in our community due to this exposure. We are currently dealing with one of the highest rates of breast cancer in California.

Why would we want to add to the toxic burden that our county is already experiencing?

Thank you,

Kathryn Eldredge  
16862 Pasquale Rd.  
Nevada City CA 95959  
[kateldredge2904@gmail.com](mailto:kateldredge2904@gmail.com)



## **INDIVIDUAL LETTER 441: KATHRYN ELDREDGE**

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### **Response to Comment Ind 441-1**

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 441-2**

Please see Master Responses 12 and 18 through 23. In addition, please see the analysis under Impact 4.3-2, which evaluates potential impacts related to exposure of sensitive receptors to substantial pollutant concentrations, starts on page 4.3-78 of the DEIR, and includes a health risk assessment, the results of which are summarized in Table 4.3-21 on page 4.3-80 of the DEIR. As part of the analysis, the DEIR assesses potential dust impacts. Because the potential impact is concluded to be significant without mitigation, the DEIR sets forth Mitigation Measure 4.3-2 to ensure project consistency with the CARB Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying and Surface Mining Operations by requiring preparation and implementation of an Asbestos Dust Mitigation Plan (ADMP). With implementation of Mitigation Measure 4.3-2, the DEIR concludes a less-than-significant impact would occur.





**Individual Letter 442**

**From:** Katrina Christenson <katrinamariachristenson@gmail.com>  
**Sent:** Monday, April 4, 2022 12:45 PM  
**To:** bdofofsupervisors; Idaho MMEIR  
**Subject:** Idaho-Maryland Mine Project NO!

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**Ind 442-1**

I Katrina, reside in Nevada County and am opposed to the Mine. This project would cause major depletion of groundwater reserves with plans to pump millions of gallons a day, contaminate local wells which we are still dealing with the repercussions from. The Nisenan people have not been consulted, there will be nice pollution from trucks right in the middle of quiet neighborhoods. The people who live here do not want to contaminate this precious land and water systems to create a few jobs and have a mess to clean up later. Water is a precious commodity and also this will likely crush tourism which brings money into our town. This wouldn't just effect our town, but surrounding communities as well. Listen to the people who live here and not money hungry corporations. Put efforts into clean energy deals.





## **INDIVIDUAL LETTER 442: KATRINA CHRISTENSON**

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### **Response to Comment Ind 442-1**

Please see Master Responses 14 and 15 regarding groundwater. In addition, as detailed in Chapter 4.5, Cultural and Tribal Cultural Resources, of the DEIR on page 4.5-21, InContext contacted Native American tribes with the potential to have knowledge of cultural resources in the project area, which included the Nevada City Rancheria Nisenan Tribe. Responses were not received from any of the tribes. Furthermore, on November 25, 2019, Nevada County sent project notification letters with offers to consult pursuant to AB 52 to Native American tribes who had previously requested to be notified by the County. The tribes contacted by the County pursuant to AB 52 included the Nevada City Rancheria Nisenan Tribe. The Nevada City Rancheria Nisenan Tribe did not respond within the 30-day consultation period. Finally, please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 443

IDAHO-MARYLAND MINE PROJECT  
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Kay Maston

Address: 11197 Lime Kiln Rd

Organization (if applicable): Representing myself

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by 5:00 PM, April 4, 2022. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 95959-8617  
Idaho.MMEIR@co.nevada.ca.us



Ind 443-1

I moved to Grass Valley four years ago and I love the town and the people and the many local environmental groups that energize this community to create a strong bond with the natural beauty in this county.

Ind 443-2

But, that's not to say that living here is without it's challenges including a perrenial fire season, power outages and home insurance at astronomical rates. All of this is to say that in spite of the friends I've made and my connections to this community my roots here do not yet run deep.

Ind 443-3

Please vote this mine down. Don't tip the ~~see~~ scale any more in favor of moving out of this area. Don't put in peril what people live in this area for. I lived in Oroville <sup>when</sup> the spillway repair. The amount of traffic caused by the trucks impacted our quality of life but; at least it was for the greater good, not the potential profit of a foreign company!

Please vote no. KM



## **INDIVIDUAL LETTER 443: KAY MASTON**

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### **Response to Comment Ind 443-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 443-2**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

### **Response to Comment Ind 443-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**From:** Kayla Koontz <koontzk@berkeley.edu>  
**Sent:** Monday, April 4, 2022 1:28 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** DEIR Comment

**Individual Letter 444**

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Dear Members of the Nevada County Planning Commission, Nevada County Board of Supervisors, and Nevada County Planning Department Staff,

I am writing to voice my opposition to the proposed plan to reopen the Idaho-Maryland Mine. The DEIR report clearly outlines several threats to our environment and our community's well-being. I am particularly concerned about the use of water (draining of our local groundwater/wells) as well as the proposed waste water dumping. At a time when our water resources are already severely threatened, this plan would exacerbate the deteriorating environmental conditions in our county. Although the DEIR report claims to have made ample plans to mitigate environmental impact, the report outlines several changes that would in full certainty negatively affect our environment notwithstanding the ever present danger of a repeat disaster like the Siskon Mine Well. Our community is centered around our beautiful natural environment, as is our tourism industry, and locals will continue to prioritize our future over a cheap deal with a dirty mine.

Thank you,  
Kayla Koontz

**Ind 444-1**



## **INDIVIDUAL LETTER 444: PERSON**

---

### **Response to Comment Ind 444-1**

Please see Master Responses 13 through 16 regarding groundwater and Master Response 35 regarding water quality and discharge to the South Fork Wolf Creek.

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.





**Individual Letter 445**

**From:** Kayla Pearson <kaylaardell18@gmail.com>  
**Sent:** Monday, April 4, 2022 3:38 PM  
**To:** Idaho MMEIR  
**Subject:** Regarding the Idaho Maryland Mine Proposal

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Hi there,

**Ind 445-1**

I hope that this note finds you and yours safe and healthy. I am writing in regard to the proposal surrounding reopening the Idaho Maryland mine in Grass Valley, CA.

I am not in favor of the re-opening based on multiple reasons.

**Ind 445-2**

One, it will cause massive depletion of groundwater reserves to the plants based on the millions of gallons of water per day needed to power the mining initiatives. Next, I am extremely concerned about the local wells that will be contaminated. Also, we have seen the damage that previous mining has done to this community. I am in favor of learning from past missteps. The Nisenan people whose land this mine would be on have not been consulted or given

**Ind 445-3**

their blessing to move forward. The noise pollution based on close-quartered neighborhoods is another concern of this operation taking place. Finally, looking at the CEO's last venture, it ended up polluting tribal waters, followed by

**Ind 445-4**

bankruptcy, and a mess for locals to clean up.

**Ind 445-5**

**Ind 445-6**

Thank you for taking the time to review my concerns. I was raised in Nevada County. It's such a beautiful and special place. I urge you to please consider what would be lost if this project were to move forward. Please let me know if you have any questions.

With kind regards,

Kayla Pearson  
(530)613-7677



## **INDIVIDUAL LETTER 445: KAYLA PEARSON**

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### **Response to Comment Ind 445-1**

Please see Master Responses 1 and 33. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 445-2**

Please see Master Responses 13 through 15. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 445-3**

Please see Response to Comment Ind 442-1.

### **Response to Comment Ind 445-4**

With respect to potential project impacts related to noise, please see the discussions under Impacts 4.10-1, 4.10-2, and 4.10-3, which start on pages 4.10-27, 4.10-31, and 4.10-37 of the DEIR, respectively.

### **Response to Comment Ind 445-5**

Please see Master Response 3.

### **Response to Comment Ind 445-6**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 446**

April 4, 2022

To: Matt Kelley, Senior Planner  
or to whom it may concern

Re: Proposed opening of the Idaho-Maryland Mine

**Ind 446-1**

Dear Sir, My name is Keith A. Brown and I reside at 13936 Downwind Ct. My home will be negatively affected if this project is approved. I am heartily against this project. I understand that this mine closed in 1954 and with that Nevada County made the conscious decision to allow 68 years of urbanization up to the mine property. And now 68 years later they want to reverse this decision. This is unconscionable to consider approving this project to the detriment of the many property owners who will now suffer loss as to their property values and especially their water wells. I don't understand this thinking. Nevada County needs to stand by their decision that they made many years ago and protect their citizens.

**Ind 446-2**

Just a couple of observations: First, to dewater the mine will cause many wells to go dry. In my case NID put a water main down our road (Downwind Ct.) several years ago to connect their main up by the airport to their main at Brunswick Rd. In doing this we who live on Downwind Ct. specifically asked NID if while they were doing the construction could they add a lateral to the main so that we could obtain water in case the mine went thru. They told us no because the water main was so large that they would have to put in a pressure reducing station due to the pressure off the main and that was cost prohibitive for only a few connections. Therefore, NID water is not available if my well goes dry. By the way your letter states a water line will go along East Bennett which does not help us here. What recourse will us well owners have if our wells go dry? Who will pay for new wells? What mechanism is in place for claims? How long would it take to get compensation? Also to dewater the mine means pumping out millions of gallons of tainted water (arsenic and mercury) and where will that go? And doing this during a drought. This makes no sense.

**Ind 446-3**

Next, the traffic on Brunswick, with their trucks running 24/7, will be chaos. There is the new housing subdivision (200 units) on Brunswick and Idaho-Maryland. Now you add the trucks and this will be a mess as well as the pounding the roads will take.

**Ind 446-4**

There will noise and vibration from underground blasting. All of this will seriously affect property values. Who will monetarily reimburse us for the lost value on our homes?

**Ind 446-5**

This will be an environmental disaster with no real benefit to Nevada County except a few jobs. Terrible trade off.

**Ind 446-6**

I have lived here since 1984. This will totally disrupt my life. This is not fair and this companies track record is horrible, with regard to maintenance and clean up. This has



↑  
been going on since the mid-nineties with Emperor Gold trying to open the mine. I am strongly opposed to this project. I pray that Nevada County will do the right and sane thing and not approve this project and protect their citizens. Thank you.

Regards, Keith A. Brown



## **INDIVIDUAL LETTER 446: KEITH BROWN**

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### **Response to Comment Ind 446-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

### **Response to Comment Ind 446-2**

Please see Master Responses 13 through 16 regarding groundwater.

### **Response to Comment Ind 446-3**

Traffic is addressed in Chapter 4.12, Transportation of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 446-4**

Noise and vibration are addressed in Chapter 4.10, Noise and Vibration of the DEIR. Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 446-5**

Please see Master Response 2.

### **Response to Comment Ind 446-6**

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 447**

**From:** Keith Thomassen <kthomassen@mac.com>  
**Sent:** Wednesday, March 30, 2022 3:01 PM  
**To:** Idaho MMEIR  
**Subject:** The Mine

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**Ind 447-1**

You don't need to be an expert in any of the technical areas of the environmental report on the mine to make a sensible judgement on whether this mine should operate in Grass Valley. It simply doesn't pass the smell test. We all know the devastation that mining has created locally and elsewhere, with long lasting effects that has required expensive cleanup. And we know that the last project of the managers of this proposed mine ended badly for the environment; not a comforting thought as to whether they would do any better here. Finally, in my view, entrusting our environment to any company, let alone this one, to be conscientious stewards of this project for 80 years is unthinkable. The activity associated with this project is totally inconsistent with the kind of city we have become; one sought by people wanting a more quiet life from that in bigger cities, in a charming town with a variety of arts and entertainment, good restaurants, and outdoor activities in a scenic setting. If the project is approved I predict an exodus from the area of people and possibly businesses. I have personally heard, as have a number of my friends, of people coming to the area looking for housing only to walk away when they hear of the mine project.

Keith Thomassen  
Grass Valley resident



## **INDIVIDUAL LETTER 447: KEITH THOMASSEN**

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### **Response to Comment Ind 447-1**

Please see Master Responses 1 through 3. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.



**Individual Letter 448**

**From:** Kelly Holland <kholland2920@gmail.com>  
**Sent:** Monday, April 4, 2022 3:25 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** Concerns for Opening Idaho Maryland Mine by Rise Gold

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Dear Matt Kelly and Nevada County Board of Supervisors,

**Ind 448-1**

I am writing this email as a concerned citizen of Nevada County living here for over 22 years. I have had the opportunity to work and raise a family in this county. I am currently living near Memorial Park off Highway 174, one of the areas that will be affected by the 24/7 truck traffic. I was excited with all the renovations being done at Memorial Park, then learned if the Idaho Maryland mine opens, it will impact the peace and quiet of that area, because the truck traffic will be along highway 174. The truck traffic will be detrimental with the noise and air pollution caused by the non-stop truck trips. Below are some of my concerns with the mine opening. There are many, but I will focus on just a few that are quite concerning.

**Ind 448-2**

1. Truck traffic - up to 100 one way trips a day, 7 days a week, 16 hours a day!

**Ind 448-3**

2. Grading and rock compacting noise - 5 days a week for 11 years!

**Ind 448-4**

3. Noise - from compacting, excavating and grading engineered fill piles up to seven stories tall. The excavating and grading could affect spare the air days and our already high ozone area with rock particles floating in the airways.

**Ind 448-5**

4. Noise and vibration from the underground blasting and drilling.

**Ind 448-6**

5. Rezoning will raise the current limits to include more noise and traffic.

**Ind 448-7**

6. Concerned that home values will drop (have heard \$50,000 - \$100,000) that are within a seven mile radius of the mine.

**Ind 448-8**

7. Dewatering all the tunnels. Grass Valley and Nevada City are built with tunnels under them. If the water is drained, what impact will that have on the ground structure? Could it contribute to sinkholes in and around the mine area? What about the contamination of the existing wells that could run dry? What about the arsenic and other chemicals that could leach into the water systems? It has been over 60 years since Empire Mine closed and there are still contaminants found in the waters.

**Ind 448-9**

These are just a few of my main concerns and questions. There are many other concerns I have with Rise Gold opening the Idaho Maryland mine that I have not mentioned. My husband and I love this area, but have considered selling if the mine gets approved. Our grown children have even come back to live in this area, and it saddens me to think what will happen to this county if this mine gets approved.

Thank you,

Kelly and Jim Holland  
Grass Valley, CA



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## **INDIVIDUAL LETTER 448: KELLY AND JIM HOLLAND**

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### **Response to Comment Ind 448-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

### **Response to Comment Ind 448-2**

Traffic is addressed in Chapter 4.12, Transportation of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 448-3**

Noise and vibration are addressed in Chapter 4.10, Noise and Vibration of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 448-4**

Noise and vibration are addressed in Chapter 4.10, Noise and Vibration of the DEIR. Air quality associated with dust is addressed in Master Response 12. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 448-5**

Please see Response to Comment Ind 448-3.

### **Response to Comment Ind 448-6**

Impacts of the proposed rezoning are addressed throughout the DEIR. Noise in Chapter 4.10, Noise and Vibration, and traffic in Chapter 4.12, Transportation. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 448-7**

Please see Master Response 2 – Social and Economic Impacts.

### **Response to Comment Ind 448-8**

Please see Master Responses 13 through 16 regarding groundwater and Master Response 29 – Near Surface Workings and Subsidence.

### **Response to Comment Ind 448-9**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





Individual Letter 449

**IDAHO-MARYLAND MINE PROJECT  
DRAFT EIR COMMENT FORM**

To document the author of comments received, please provide the following information. Thank you.

Name: Kelly Trueman

Address: 13721 Mckitrick Ranch Rd

Organization (if applicable): \_\_\_\_\_

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

**Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 95959-8617  
Idaho.MMEIR@co.nevada.ca.us**

Ind 449-1

There is literally no good reason other than the greed of a few people, for this mine to go ahead.  
This community will be heavily impacted negatively for potentially centuries to come.  
The water will be poisoned, the habitat & local animals & fish will be negatively effected.  
The reasons behind this movement do not justify the impact.





## **INDIVIDUAL LETTER 449: KELLY TRUEMAN**

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### **Response to Comment Ind 449-1**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.



**Individual Letter 450**

**From:** [Kendal smeeth](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** Comment on EIR and proposed reopening of the mine  
**Date:** Friday, February 4, 2022 9:07:32 AM

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Attention: Matt Kelly

**Ind 450-1**

As a resident of Nevada City, I am opposed to reactivating the Idaho Maryland Mine. During my 48-year career, I spent many years preparing and/or reviewing Environmental Impact Reports. This EIR, in my experienced opinion, skews the data to downplay environmental impacts from truck traffic in particular and operations in general and exaggerate the jobs and other economic benefits of the mine. Their proposed use of our water would seem to be reason enough to deny acceptance of the EIR.

**Ind 450-2**

I hope the Planning Commission and Board of Supervisors do not allow the lure of tax dollars to blind their understanding of the harm mine operations will cause to our quality of life. Grass Valley and Nevada City are rare gems among California's livable cities. While many other areas in our state may be acceptable for this kind of heavy industry and related pollution, we must protect our fragile forests, air quality, and precious few water resources. Please do not make the mistake of thinking this EIR adequately describes the mine's immediate or long-term affects on our unique, treasured way of life here in Nevada City/Grass Valley.

Sincerely,  
Kendal Smeeth  
13607 Red Dog Road  
Nevada City, CA 95959

Sent from [Mail](#) for Windows



## **INDIVIDUAL LETTER 450: KENDAL SMEETH**

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### **Response to Comment Ind 450-1**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 450-2**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.



**Individual Letter 450**

**From:** [Kerrick Anderson](#)  
**To:** [Idaho MMEFB](#)  
**Date:** Thursday, February 10, 2022 2:47:21 PM

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Dear County of Nevada

**Ind 451-1**

I am writing to ask you on bended knees NOT to allow the mine to go through. I'm not quite sure why this is even a question, as you must've known from the start the PEOPLE of this county do not want it in our beautiful home. I can only think that your motivation is to bring tax dollars into our county, but you must know that is not enough. Those dollars will end up cleaning up the mess left by the mine and all the people this mine has affected. Please represent your people and understand that the almighty dollar is not that important. We must maintain our beautiful quality of life.

**Ind 451-2**

Remember also, that no matter what they say, there will be problems with this endeavor. Wells will go dry and become contaminated. Who will fix that? Not the mine. Not the county. Are you going to leave us stranded?

**Ind 451-3**

Our property values will go down, as who wants to live by a noisy, dirty mine and worry about our wells. Are you going to leave us stranded?

**Ind 451-4**

Who will protect us from pollution, increased traffic and cave ins? Are you going to leave us stranded?

No matter what the studies say, we will have problems and all of them will fall on the people you represent. Is that right?

Let's do what is right and not what looks to be a money maker. Please protect the people and the environment you represent.

Thank you

Kerry and Sue Anderson

Sent from my iPad



## **INDIVIDUAL LETTER 451: KERRY AND SUE ANDERSON**

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### **Response to Comment Ind 451-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 451-2**

Please see Master Responses 13 through 15. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 451-3**

Please see Master Response 2 – Social and Economic Impacts. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 451-4**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.





Individual Letter 452

Dist 1

Ind 452-1

**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can provide a strong economic future for today and for decades to come. Rise Cross Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 600 new employees in safe and satisfying careers with an average expected annual earnings of more than \$22,000 including benefits. The mine will also spur an additional 300 jobs through related new businesses in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Cross Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kim + Don Crevoiserat  
Address 13243 Loma Rica Dr, GV ZIP 95945  
Phone 530392.0424  
Email Address kimcrev@yahoo.com

*No, do not support the Idaho-Maryland Mine.*



## **INDIVIDUAL LETTER 452: KIM CREVOISERAT**

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### **Response to Comment Ind 452-1**

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



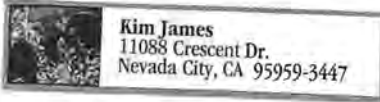
Individual Letter 453



Rise Grass Valley  
PO Box 271  
Grass Valley CA 95945

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Nevada County Board of Supervisors  
950 Maiden Ave.  
Nevada City, CA 95959

RECEIVED

FEB 28 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Attn: Heidi Hall

959593447 C001

Please fill out and send back to us your support for the Idaho-Maryland Mine

<sup>DO NOT</sup>  
I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 600 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) \_\_\_\_\_  
Address \_\_\_\_\_ ZIP \_\_\_\_\_  
Phone \_\_\_\_\_  
Email Address \_\_\_\_\_

**NO MINE**



Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit [RiseGrassValley.com/contact](http://RiseGrassValley.com/contact) and sign up.

RECEIVED

FEB 28 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Ind  
453-1



## **INDIVIDUAL LETTER 453: KIM JAMES**

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### **Response to Comment Ind 453-1**

Please see Master Response 1 Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 454**

Dist 1

**RECEIVED**

FEB 28 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

February 24, 2022

Kim James  
11088 Crescent Drive  
Nevada City, CA 95959

Nevada County Board of Supervisors  
950 Maidu Ave.  
Nevada City, CA 95959

ATTN: Heidi Hall

**RE: Idaho-Maryland Mine**

Dear Supervisor Hall,

**Ind 454-1**

I have been a Nevada County resident for over 20 years. I am very concerned about the harmful impacts of the Idaho-Maryland Mine, regarding noise pollution and quality of life.

For two years I lived on Dorsey Drive in Grass Valley, which became a commonly used road for large trucks after the onramps and offramps were installed. The constant noise from random large vehicles was unbearable and I moved. I sure wouldn't want to live near a dedicated mining operation.

There are many questionable claims made by Rise Gold, which seems to be a troubled and untrustworthy company, which is reason enough to be skeptical of their intentions.

**Ind 454-2**

Please do not approve the Idaho-Maryland mine project.

Do the right thing and protect our community.

Thank you,



Kim James





## **INDIVIDUAL LETTER 454: KIM JAMES**

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### **Response to Comment Ind 454-1**

Noise is addressed in Chapter 4.10, Noise and Vibration of the DEIR. Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 454-2**

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 455

January 30, 2022

Matt Kelley  
Senior Planner  
Nevada County Planning Department  
[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

Mr. Kelley

I am submitting comments on technical evaluations presented in the Idaho-Maryland Mine Project DEIR.

Ind 455-1

1. **Carbon offset plans for GHG mitigation:** The county should require that these carbon offsets be purchased from Nevada County/ surrounding county sources and there should be a bond in place that guarantees performance of these offsets for at least 10 years before the project applicants' responsibility is complete. There are several reasons for this. First, carbon offsets are extremely difficult to measure and guarantee. Having the offsets be local would allow oversight of performance. Second, Nevada County needs to move towards climate change resiliency and a lower carbon future. Keeping the benefits of the GHG carbon offsets in the same place as the environmental costs of the mine is consistent with sustainable practice.

Ind 455-2

2. **Groundwater monitoring wells:** Previous hydrologic studies in Nevada County have concluded that the fractured bedrock aquifer supplies water to do not work the same way alluvial aquifers do. Water levels at one site may have completely different response times than water levels at a nearby site because the fracture networks supplying those wells may not be connected. As a result, using area-wide potentiometric contour maps as a means of evaluating dewatering impacts is not appropriate. Additionally, local precipitation is highly variable, meaning that groundwater levels in individual wells will probably vary with the frequency of major storm events.

A scientifically defensible water level monitoring network requires measuring water levels at a frequency greater than anticipated changes in order to clearly ascertain the difference between natural recharge, current hyper-local water uses, and the impact of the project's dewatering. In addition, the network of water monitoring sites must extend outside the subsurface footprint of the mine tunnels (the underground minerals rights area) and include wells in riparian zones to track where groundwater depletion may begin affecting surface water flows.

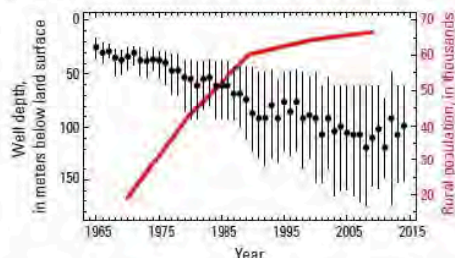
The current plan is technically insufficient because it does not require the spatial extent and frequency needed to provide an early-warning for irreversible dewatering impacts. It also allows for improper seasonal averaging of data and for improper averaging of water level measurements across the site when impacts could be severe and unmitigated in a portion of the site.

Ind 455-3

3. **Groundwater depletion mitigation:** The current plan for mitigation of groundwater depletion impacts (4.8-2(b)) says the "project shall be responsible for providing a comparable supply of water to such homes and businesses whose wells are significantly impacted." This plan presumes that water is available for purchase to provide that supply, and that NID or deeper wells will be able to provide the water in question.



This graph shows the overall decline in the county's groundwater levels since 1970s due to the increased number of domestic wells and population.



**Figure 2.** Well-completion depths in the study area binned by year: points represent the median of annual data and whiskers span the interquartile range. Rural population (red line) represents census population data for the unincorporated area of Nevada County from 1970 to 2010.

During droughts, many of the existing wells in the County are already running dry, so having the project proponent deepen an affected well may not end up providing a reliable source of water over the long-term. The plan also relies on NID being able and willing to extend service. The project should not move forward unless and until NID provides documentation about how much backfill water supply the agency can actually provide beyond the estimated 30 homes. The determination that there is a less than significant impact on public services 4.11-10 is inaccurate and based on incomplete analyses.

For scale, the initial dewatering volume is estimated to be 2500AF over the first six months of operation and 1376 AF/ year on an ongoing basis (p. 177 and p. 3-18) . NID currently supplied 8657AF to all public water supply customers in 2020 (NID Urban water management plan). In other words, the project is planning to send about **one third of the volume of NID's total annual treated water supply downstream in the first six months of pumping; continuous dewatering estimates are for a volume equal to about 16% of total treated water supply to be sent downstream.** These are, of course, estimates. The actual amount could be vastly different. The County needs to have plans in place that would require cessation of dewatering if the actual performance of the project ends up with different water volumes/ dewatering impacts than projected.

SB 552 was enacted on September 23, 2021 and requires the County to plan for and facilitate water shortage preparedness planning. The potential impact of dewatering and exporting per year volume of water from the County should be evaluated in the context of future drought resiliency before this project is approved. The legal distinction that groundwater in Nevada County is not part of a groundwater basin is a technical justification for avoiding this issue. It is not sound policy or science, and the County has a duty to consider long-term sustainability regardless.

Respectfully,  
Kim Taylor, 10231 Mills Rd Grass Valley 95945



## **INDIVIDUAL LETTER 455: KIM TAYLOR**

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### **Response to Comment Ind 455-1**

The commenter asserts that the carbon credits that are to be purchased as mitigation for the project's GHG emissions should involve a bond to ensure performance and should also be purchased locally. The requirements for carbon credits are detailed in Mitigation Measure 4.3-7(b) of the DEIR. Also, please see Master Response 28 – Greenhouse Gas Credits.

As specified in Mitigation Measure 4.3-7(b), the carbon offset must be retired prior to the issuance of the project's first grading permit and therefore a bond is not required. The mitigation measure requires an instrument, credit or other certification issued by the specified registries for GHG reduction activities within the Nevada County region. Global climate change is by definition a global impact; therefore, purchase of credits from offsets produced locally would not reduce the impact or change the effectiveness of the mitigation.

### **Response to Comment Ind 455-2**

The commenter states that previous studies in Nevada County have determined that fractured bedrock aquifers do not work the same way as alluvial aquifers and that use of area-wide contour maps is not appropriate. The commenter does not provide the name or details of previous hydraulic studies in Nevada County which conclude that the fractured bedrock aquifer does not work the same way as alluvial aquifers. However, Section 3.4.4 of Appendix K.2 and Section 4.8.2 of the DEIR (at page 4.8-18) discuss the flow of groundwater within fractured bedrock in the project area. The groundwater model used an appropriate methodology to predict groundwater drawdown from mine dewatering in bedrock, and is not assuming that water in bedrock is exactly the same as in an alluvial aquifer. Please see Master Response 14 – Adequacy of Groundwater Model.

The commenter states that local precipitation is highly variable and groundwater levels in individual weeks will probably vary with the frequency of major storm events. Due to variations in topography, for example between downtown Grass Valley and on Banner Mountain, local variation in precipitation may be appreciable. However, as discussed in Section 3.2 and shown on Figure 3-4 of Appendix K.2 of the DEIR, rainfall variation between wet and dry climatic cycles can vary by more than a factor of three. Despite this magnitude of variation, the available data shows that seasonal cycles in groundwater levels in local domestic supply wells remain relatively consistent from year to year and do not show any notable fluctuations in response to very wet years or very dry years, as shown on the hydrographs in Appendix B of Appendix K.2 of the DEIR and discussed in Section 4.8.2 of the DEIR (at pages 4.8-11 to 4.8-12). Thus, potential variations to recharge and the effects on groundwater levels has been considered in the DEIR, based on both local rainfall data and actual monitoring data from local groundwater wells. No groundwater level measurements have been completed since 2007, which creates some uncertainty to the predicted impact to percentage of water column in domestic wells. Uncertainty in predicted impacts is addressed through the various sensitivity scenarios discussed in Appendix K.3, the application of a 100% factor of safety (see page 4.8-58 of the DEIR), and the proposed connection of 30 properties, including properties where no significant impact is predicted, in the E. Bennett area to NID potable water (see page 4.8-66 of the DEIR). Nevertheless, the analysis in Chapter 4.8 of DEIR has determined that the project could result in a significant impact to groundwater supplies without implementation of a groundwater monitoring program and well mitigation plan. Mitigation Measure 4.8-2(a) requires that a minimum of 12 months of water-level monitoring data is collected before commencement of dewatering. Impacts to domestic water wells will be measured against those current baseline measurements and not historic water levels. Mitigation





Measure 4.8-2(b) requires well mitigation if, based the groundwater monitoring plan, a 10 percent reduction in the water column of a well is determined. Therefore, the determination of impact would be based on current water level data and any impacts to domestic wells would be mitigated through the proposed mitigation measures.

The commenter states that water level monitoring requires monitoring of water levels at a frequency greater than expected changes in order to ascertain the difference between natural recharge and the impact of the project's dewatering. The well monitoring plan incorporates the collection of water level data for 12 months prior to the commencement of dewatering. This baseline information allows the effects of natural recharge, and seasonal variability, to be accounted for in the measurement of the effect on water levels from mine dewatering. Monitoring wells are also located outside of the impact area of mine dewatering to measure regional changes in water levels in order to differentiate groundwater drawdown from mining versus background conditions. As stated on page 13 of Appendix K.8, each monitoring well will be equipped with a downhole submersible data logger that will record water levels over time. The data logger will be programmed to collect water-level information on a periodic basis, such as once every 1 to 4 hours. Therefore, water level monitoring will be collected at a frequency greater than expected changes and can be collected at appropriate intervals to measure the response to mine dewatering. Seasonal averaging of data or water level measurements would occur as claimed by the commenter. The network of water monitoring wells is planned to extend outside of the subsurface footprint of the mine tunnels (see Appendix K.8). The location of underground mineral rights boundaries is irrelevant as the location of existing and proposed underground mine workings will determine the impact to groundwater levels.

Monitoring wells in riparian zones are not required. Mine dewatering will not impact riparian zone or groundwater dependant vegetation. Please see Master Response 33 – Groundwater Dependent Vegetation. The project will not significantly affect surface water flows, see page 4.8-65 of the DEIR.

Please also see Master Response 7 – Location of Future Mining Areas. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

### **Response to Comment Ind 455-3**

The commenter provides a graph of well depths in Nevada County from the period of 1970 through 2010 but does not provide the source of this material to allow for an evaluation or a technical response. As disclosed in Section 3.3.2.2 of Appendix K.2 of the DEIR, the water levels in the private domestic wells have seasonal fluctuations that may range from 10 feet to 50 feet between wet and dry times of the year, but remain relatively consistent from year to year within each individual well. During the monitoring period, several years with below normal rainfall occurred (2001, 2004, and 2007), multiple years with above normal rainfall occurred (1995-1998 and 2006), and several years of near-normal rainfall occurred (1999, 2000, 2002, 2003, 2005). Despite large variations in annual rainfall from year to year, the seasonal water level cycles in individual wells remained consistent over time and the overall water levels shown on the hydrographs for each well do not fluctuate based on wet or dry climatic cycles. The analysis in the DEIR relied upon local data from wells in the project vicinity. Without a source citation or the actual data upon which this comment is based, the County does not have a basis upon which to compare it with the data





relied upon for the EIR. No groundwater level measurements have been completed since 2007, which creates some uncertainty to the predicted impact to percentage of water column in domestic wells. Uncertainty in predicted impacts is addressed through the various sensitivity scenarios discussed in Appendix K.3, the application of a 100% factor of safety (see page 4.8-58 of the DEIR), and the proposed connection of 30 properties, including properties where no significant impact is predicted, in the E. Bennett area to NID potable water (see page 4.8-66 of the DEIR). Nevertheless, the analysis in Chapter 4.8 of DEIR has determined that the project could result in a significant impact to groundwater supplies without implementation of a groundwater monitoring program and well mitigation plan. Mitigation Measure 4.8-2(a) requires that a minimum of 12 months of water-level monitoring data is collected before commencement of dewatering. Impacts to domestic water wells will be measured against those current baseline measurements and not historic water levels. Mitigation Measure 4.8-2(b) requires well mitigation if, based the groundwater monitoring plan, a 10 percent reduction in the water column of a well is determined. Therefore, the determination of impact would be based on current water level data and any impacts to domestic wells would be mitigated through the proposed mitigation measures.

As discussed in the Well Mitigation Plan, if a dewatering impact to an area outside of the E. Bennett area were projected during operations, pre-emptive action would be taken as necessary to ensure immediate water supply and compensation. The comment is incorrect in stating (with underline added for emphasis) that the mitigation plan presumes that water is available to purchase, since one of the options under the plan is to deepen an affected well. Well deepening does not require purchase of any water. In addition, if reduction of the water column in a well was great enough to reduce the well's yield, adjustment of the pumping system may only be required; for example, by pumping at a lesser rate over a longer duration and installing or increasing the size of a pressure or holding tank. In the unlikely case where these measures were not sufficient, appropriate mitigation could be the deepening of a single well, drilling of a new well, or the provision of potable water service.

Comparison of the volume of water that would be pumped from the mine with NID's treated water supply is not relevant. The treated water supply is provided by NID's "upper division" surface water system that relies on annual snowmelt and available reservoir capacity. The water pumped from the mine will consist of seepage of groundwater into the underground workings from depths that are considerably deeper than local groundwater supply wells. Mitigation measures in the DEIR and parts of the County Code define the actions that the operator would need to take if any wells are impacted by the project. If those measures are not or cannot be successfully implemented, then the County would have the ability to issue a Notice of Violation of the permit and could require cessation of dewatering if the violation is not corrected. Thus, such plans are already in place.

Senate Bill 552 of 2021 applies to small water suppliers with fewer than 1,000 connections and to schools that maintain their own water system. Other existing regulations related to water shortage planning already apply to NID, which has approximately 25,000 connections (see <https://www.nidwater.com/our-story>) and the County. Both NID and the County are in compliance with applicable drought resiliency requirements.



**Individual Letter 456**

**From:** KIM / PAUL CAPPА <kimcappa@comcast.net>  
**Sent:** Monday, April 4, 2022 9:32 AM  
**To:** Idaho MMEIR  
**Subject:** DEIR deficiencies

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

**Do not click links or open attachments unless** you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Mr. Matt Kelley,

My name is Kimberly Cappa, I am in District 3, I retired to this beautiful community 5 years ago.

**Ind 456-1**

I spent my career at an oil refinery in the bay area. As much as you like to think that safety is #1...there is ALWAYS going to be mechanical failure or human failure for that matter. This is why I am against the re-opening of the Idaho-Maryland mine.

**Ind 456-2**

After looking over the DEIR, I believe there are some impacts that ARE NOT going to be mitigated. The greenhouse gas emissions are unavoidable. I know from working at the refinery 23 years that California keeps working to get those emissions numbers down. Our legislators have passed a climate policy to reduce GHG. What Rise Gold acknowledges now, MIGHT be within the limit, but in 2030 it will be OVER the limit. And years into the future even worse, it just isn't feasible. And if they think they can purchase carbon offsets they are wrong and California will say NO DEAL.

**Ind 456-3**

There are other impacts I don't think they can mitigate such as the noise levels, fire and explosion evacuations, groundwater issues, explosives in transit/storage and loss of habitat for local birds and animals.

**Ind 456-4**

Another important thing I'd like to comment on is the fact that the DEIR did not even mention that this will bring property values down. We don't want spoiled air, land or water in our backyard.

Thank you for taking the time to hear my concerns,  
Kimberly Cappa



## **INDIVIDUAL LETTER 456: KIMBERLY CAPP**

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### **Response to Comment Ind 456-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 Non-EIR/Administrative Issues.

### **Response to Comment Ind 456-2**

Please see Master Responses 25 through 28. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 456-3**

Noise is addressed in Chapter 4.10, Noise and Vibration of the DEIR. Evacuations are addressed in Master Response 5 – Evacuation Zones. Please see Master Responses 13 through 16 regarding groundwater. Hazards are addressed in Chapter 4.7, Hazards and Hazardous Materials of the DEIR, and impacts to wildlife is addressed in Chapter 4.4 Biological Resources of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 456-4**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 457**

March 28, 2022

Matt Kelley, Senior Planner

(Sent electronically to Idaho.MMEIR@co.nevada.ca.us)

Nevada County Planning Department

950 Maidu Avenue, Suite 170

Nevada City, CA 95959-8617

Subject: Idaho-Maryland Mine Project Draft EIR (SCH # 2020070378)

Dear Mr. Kelley,

**Ind 457-1**

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (Draft EIR) for the proposed Idaho-Maryland Mine Project (proposed project). The proposed project would reinitiate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year permit period with gold mineralization processing and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations. The operations of the proposed would allow for unmitigable impacts on our community for 80 years resulting in significant and unavoidable environmental impacts as well as the damage the character and vitality of the community.

**Significant and Unavoidable Impacts**

The Draft EIR has determined that the following project impacts would remain significant and unavoidable, even after implementation of the feasible mitigation measures:

- Aesthetics

**Ind 457-2**

The Draft EIR determined that the proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The Draft EIR also determined that the project's incremental contribution to the significant cumulative impact related to substantial degradation of visual character or quality would be cumulatively considerable and significant and unavoidable.

- Noise.

The Draft EIR determined that during construction activities, the project could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity (i.e., residents along East Bennett Road during construction of the potable water line). Even with implementation of mitigation, the impact would remain significant and unavoidable.

- Transportation and Circulation

The draft EIR determined that the proposed project would result in a significant impact at three study intersections under the EPAP Plus Project scenarios, one of which would be significant and unavoidable



even after mitigation (Brunswick Road/SR 174). The Draft EIR also determined that the proposed project would have a cumulatively considerable incremental contribution to two intersections under both Cumulative Plus Project scenarios, one of which would be significant and unavoidable Draft EIR Idaho-Maryland Mine Project December 2021 Chapter 6 – Alternatives Analysis Page 6-8 even after mitigation (Brunswick Road/SR 174). In addition, the project's incremental traffic would cause a significant impact at one intersection queue during both Cumulative Plus Project scenarios (Brunswick Road/Sutton Way). Mitigation measures are identified and required for the aforementioned cumulative impacts, but it cannot be guaranteed that the measures would reduce the incremental impacts to a less than cumulatively considerable level.

#### Preference of the No-Build Alternative

Preference of the Environmentally Superior Alternative, which is Alternative 1: No Project (No-Build) Alternative. The No-Build ensure that the project area and the public would not result in project related impacts in the following CEQA Appendix G sections:

- Aesthetics
  - The proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The proposed project would result in tailings, the reduction of vegetative cover, the erection of industrial use buildings, mining equipment, engineered fill, and frequent trucks to transport materials. The No-Build would not impact the visual character or quality of the site and its surroundings.
- Air Quality
  - The proposed project would result in more truck traffic to the project area resulting in more air quality emissions, which may affect the health of the community even with the implementation of mitigation measures. The No-Build would not disturb naturally occurring asbestos as could possibly occur during underground mining.
- Biological Resources
  - The No-Build would not have the potential to impact special-status plants, foothill yellow-legged frog, western pond turtle, California red-legged frog, California black rail, coast horned lizard, special-status bats, and non-special status raptors and migratory birds. In addition, the Alternative would not result in any substantial adverse effects on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on federal or State protected aquatic resources.
- Cultural Resources
  - The No-Build would not have a substantial adverse effect to the underground mine workings, which were determined to be historically significant pursuant to the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR). The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.
- Energy
  - The No-Build would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project

Ind 457-3





construction or operation. The No-Build would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

- Geology/Soils
  - The No-Build would not include underground mining and generation of engineered fill, grading or other ground-disturbing activities, substantial soil erosion would not occur. In addition, the near-surface geotechnical features identified for closure due to dewatering of the mine would not be adversely impacted, though they may currently pose some level of risk that would continue under the Alternative. Other geotechnical issues that could pose a significant effect under the proposed project, but would not pose an adverse effect under the Alternative, include potential seismic hazards at the Brunswick Industrial Site and slope stability associated with temporary steep cut slopes at the new service shaft collar. However, the proposed project would fix a few existing geotechnical issues that would remain under this Alternative, including the safety concern related to the presence of the South Idaho Shaft on the Centennial Industrial Site, and an unstable portion of the clay-lined pond dam on the Brunswick Industrial Site.
- Greenhouse Gas Emissions
  - The No-Build would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
- Hazards & Hazardous Materials
  - The proposed project could result in a significant impact related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, specifically, the transport and underground storage and use of explosives at the Brunswick Industrial Site. Compliance with applicable federal (MSHA, OSHA), State (CCR), and local regulations, and the additional mitigation measures in the Draft EIR, would reduce the significant hazard related to transport, underground storage and use of explosives to a less-than-significant level. Because the use of explosives would be eliminated under the No-Build, the significant impact would also be eliminated. The Draft EIR determined that the proposed project could result in a significant impact related to creating a significant hazard through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment related to the Brunswick Industrial Site, given the presence of elevated arsenic in the southeastern paved area, potential residual petroleum contamination in a few locations, and presence of groundwater monitoring wells of unknown status. The No-Build would result in fewer
    - impacts related to hazards and hazardous materials.
- Hydrology/Water Quality
  - The No-Build would not result in on-site construction disturbance or above-ground operations such that the following project-related significant impacts to water quality would not occur: Centennial Industrial Site: engineered fill pad construction; Brunswick Industrial Site: operations within industrial area, underground placement of Cement Paste Backfill, use of clay-lined pond for water treatment process purposes, engineered fill pad construction, and treated water discharge in South Fork Wolf Creek. In addition, the No-Build would not necessitate dewatering of the mine; thus, there would not be a substantial reduction in groundwater supplies resulting in effects to nearby wells, though the proposed project



includes mitigation to offset impacts to wells (i.e., provision of potable water service). Further, due to the lack of on-site operations, the No-Build would not result in the substantial alteration of drainage patterns, and for the Centennial Industrial Site, risk release of pollutants in a flood hazard area.

- Noise
  - The No-Build would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity, nor a substantial permanent increase in ambient noise levels in the vicinity of the project due to haul truck traffic. In addition, the Draft EIR concludes that the combined operational noise sources at the Brunswick Industrial Site could result in a significant noise impact. With respect to vibration, the Draft EIR determined that while blasting is not projected to exceed applicable thresholds, a ground vibration monitoring program should be implemented to determine the actual levels of ground vibration at commencement of mining. These operational noise and vibration impacts would not occur under the No-Build.
- Tribal Cultural Resources
  - The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.
- Transportation
  - The No-Build would not generate construction traffic or operational vehicle traffic on local roadways and, thus, unlike the proposed project, the Alternative would not result in a significant construction traffic impact, nor would General Plan LOS policy conflicts occur under the EPAP Plus Project conditions to the intersections of Brunswick Road/Idaho Maryland Road, Brunswick Road/SR 174, and Idaho Maryland Road/Centennial Drive; and under the Cumulative Plus Project scenarios to the intersections of Brunswick Road/SR 174 and Sutton Way/Dorsey Drive. The proposed project would also result in a significant effect to the intersection queue during the Cumulative Plus Project scenarios (Brunswick Road/Sutton Way), which would not occur under this Alternative. Further, the Draft EIR determined that proposed project (Brunswick Industrial Site operations) would have an impact related to truck turn movements at the Millsite Road/E. Bennett Road project egress at the Brunswick Industrial Site; this effect would not occur under this Alternative. The Draft EIR determined that some of the above-noted impacts would be considered significant and unavoidable due to the uncertainty concerning certain mitigation measures. The subject impacts are the EPAP Plus Project and Cumulative Plus Project intersection impacts to Brunswick Road/SR 174 and the Cumulative Plus Project intersection queue at Brunswick Road/Sutton Way. These significant and unavoidable impacts would be eliminated under this Alternative.
- Wildfire
  - The No-Build would not result in a significant impact related to exacerbating wildfire hazards, as compared to the proposed project. For example, above-ground machinery would not be operated at both project sites. Therefore, potential vegetation fires associated with on-site equipment operations would be substantially reduced under the No-Build.

**Beyond the Scope of CEQA**

CEQA can be narrow in scope and does not address various issues such as social or economic issues.

Ind 457-4



Ind 457-5

Ind 457-6

Ind 457-7

The Draft EIR notes relevant caselaw on how impacts on private views are not studied under CEQA. Although this is true and accurate under CEQA, the property owners for those that would be impacted by the next 80 years of constant operation and construction would surely face a reduction in property value. Overall, the operations of the mine may act as a deterrent for the community and reduce the overall appeal of tourism as well as the demand for property within the area. Certainly, community members have voiced their concerns in significant numbers. It is clear that our community takes great pride in the environment in which we live and want to protect it. Any activity that undermines our attraction of tourism and to the draw of people who so recently are moving to this community to work remotely is a negative for the members of this beautiful, historic community. It is true that adding jobs to our local economy could be a valuable boost. But there are other jobs that could be encouraged. A good portion of the jobs that Rise Gold is promising are trucking jobs. Will those truly be given to local people? Furthermore, those of us that live here are taking steps to conserve water and are alarmed for our neighbors that have wells. Many variables could impact ground level and our residents consider any deep underground disturbances to be an unnecessary risk during this time of severe drought. So many of us have friends who already have well issues. This is evidence that our environment is fragile

Thank you for the opportunity to review and comment on the Draft EIR. If you have any questions or would like clarification, please contact me at [shureen@pacbell.net](mailto:shureen@pacbell.net)

Sincerely,

Kimberly Shureen



## **INDIVIDUAL LETTER 457: KIMBERLY SHUREEN**

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### **Response to Comment Ind 457-1**

The comment restates conclusions of the DEIR, but does not specifically address the adequacy of the DEIR.

### **Response to Comment Ind 457-2**

The comment restates the significant and unavoidable conclusion in the DEIR, but does not specifically address the adequacy of the DEIR.

### **Response to Comment Ind 457-3**

The comment expresses the preference for the No Project Alternative and cites the analysis of the No Project Alternative from Chapter 6, Alternatives Analysis, of the DEIR. The comment does not specifically address the adequacy of the DEIR.

### **Response to Comment Ind 457-4**

Please see Master Responses 1 and 2.

### **Response to Comment Ind 457-5**

Please see Master Responses 1 and 2.

### **Response to Comment Ind 457-6**

Please see Master Response 2.

### **Response to Comment Ind 457-7**

Please see Master Responses 13 through 16 related to groundwater. Please see Master Response 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





Individual Letter 458

IDAHO-MARYLAND MINE PROJECT  
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: KOULL SHANE

Address: 12433 SUMMIT RIDGE RD

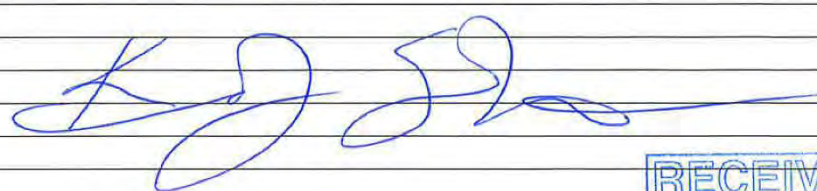
Organization (if applicable): \_\_\_\_\_

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

**Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 95959-8617  
Idaho.MMEIR@co.nevada.ca.us**

Ind 458-1

I COMPLETELY OPPOSE  
THE RISE MINE FOR  
ENVIRONMENTAL  
SOCIAL & HYDROLOGIC  
REASONS. ITS MADNESS





## **INDIVIDUAL LETTER 458: KOVIL SHINE**

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### **Response to Comment Ind 458-1**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 459

Dist 1

Nevada County Board of Supervisors  
950 Maidu Avenue  
Nevada City, CA 95959-8617  
bdofsupervisors@co.nevada.ca.us

RE: Businesses OPPOSE Rise Gold's proposal to re-open the Idaho-Maryland Mine

Dear Supervisors:

The undersigned businesses respectfully request that you oppose Rise Gold's proposal to re-open the Idaho-Maryland Mine.

Ind 459-1

Mining is our past, not our future. During the past 50 years, Nevada County has worked diligently to attract people and investments that contribute to and renew its economic vitality through promising and sustainable enterprises which align with the aspirations of its residents. That is what continues to make this County an attractive place to live, to make a living, and to start new business ventures.

Ind 459-2

Reopening the mine risks a transformation from a community that is a scenic and cultural destination to an industrial town that tolerates excess noise, dust, and truck traffic. It would entail supporting a business that puts precious water resources at risk, generates significant greenhouse gases, and consumes so much energy that it would completely erase the county's plan to reduce the effects of climate change. The mine could become a deterrent for many seeking to build new business opportunities in Western Nevada County, resulting in reduced community investment and property values. We welcome the County's call for an independent economic study of the impacts of the proposed mine and expect that it will include a non-mine alternative.

Ind 459-3

Ind 459-4

Rise Gold's promises to inject money into the local economy may sound attractive, but Nevada County can do better by continuing to invest in existing industries as well as new enterprises that address current priorities in the Sierra like watershed and forest management. The Economic Policy Institute Brief cited by Rise Gold actually shows that other industries can produce far better job numbers than mining, including eight industries Nevada County already has today. An economic study commissioned by the City of Grass Valley during Engold's attempt to reopen the Idaho-Maryland Mine in 2008 concluded that Nevada County would be better off economically if it pursued other opportunities than mining.

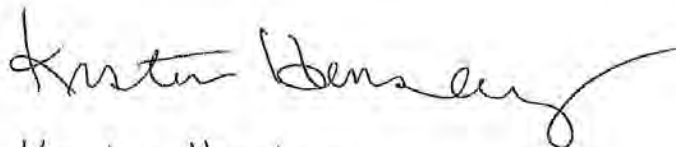
Ind 459-5

An industrial gold mine would not be a constructive addition to our community. The social and economic benefits are far from clear. The environmental impacts are sobering.

We urge you to protect our health, economy, and quality of life. Please deny Rise Gold's application to reopen the Idaho-Maryland Mine.

Thank you for your time and consideration.

Sincerely,



Kristen Hensley



Cc: Alison Lehman, County Executive Officer, Nevada County  
Grass Valley City Council members  
Tim Kiser, City Manager, Grass Valley  
Grass Valley Union



## **INDIVIDUAL LETTER 459: KRISTEN HENSLEY**

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### **Response to Comment Ind 459-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 459-2**

Please see Master Response 1 – Non-EIR/Administrative Issues. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 459-3**

The comment does not address the adequacy of the DEIR. Please see Master Response 2.

### **Response to Comment Ind 459-4**

The comment does not address the adequacy of the DEIR. Please see Master Response 2.

### **Response to Comment Ind 459-5**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 460**

Dist 3

**RECEIVED**

MAR 01 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

February 22, 2022

Dear Nevada County Board of Supervisors,

My Name is Kristen Krauel-Privett. I live near the Empire Mine State Park in District 3 with my husband and our 13 month old daughter. I am a Licensed Clinical Social Worker (LCSW) for the Sierra Foothills Veterans Clinic in Auburn and my husband is a longshoreman out of the Port of Oakland. I am hoping that you will deeply consider my comments in regard to determining whether to approve the opening of the Idaho-Maryland Mine in Grass Valley.

**Ind 460-1**

Like a lot of families, our family chose to move to Grass Valley to be closer to nature and a natural way of life. My husband and I both grew up in remote Modoc County. We lost touch after high school but serendipitously reconnected after moving to San Francisco within weeks of each other for our jobs. After bringing our baby girl into the world, we knew we wanted to raise her in a community in which she would have the opportunity to cultivate a strong relationship with the outdoors and Mother Earth. Things we both feel benefited us tremendously growing up. An area in which she could safely walk or ride her bike about the neighborhood, raise animals, and enjoy the natural beauty of her surroundings while still maintaining access to a variety of medical care and shopping.

Unfortunately, we didn't learn of the potential opening of the Idaho-Maryland Mine until after we moved here. Had we known, we may not have taken the risk. We have dire concerns that the opening of the mine will result in higher noise levels, including vibration from blasting, and harm to the surrounding wildlife and natural settings. Our prior living in San Francisco made us all too aware of the negative impact high noise levels can have on one's quality of life. As a longshoreman, my husband experiences a detrimental level of noise and machinery related vibration on the job. This is yet another reason why we chose to move to Grass Valley, as working AND living in noise infested environments is not a healthy combination for my husband (nor anyone for that matter). His work, however, influenced him to immerse himself in learning about the negative impact of industrial vibrations on physical and mental health as well as various sound healing modalities.

**Ind 460-2**

In addition to noise related dismays, we worry the mine will seriously compromise the quality of our air and water. I understand the water quality board will have to rely on Rise Gold, a mining company with a history of environmental violations, for environmental assurances reports. Our daughter's pediatrician educated us about the risk the mine poses to her health (not to mention our health and the health of our community). I am tearing up as I think about our smiley daughter being subjected to increased toxins through the water she drinks and air she breathes. After being diagnosed with endometriosis and battling related fertility challenges to have our miracle baby, I learned a great deal (more than I would've liked) about the link between environmental toxins, fertility, and health. I would hate for our daughter and community to fall victim. Surely the few jobs gained from the mine will be seriously offset by the risk of losing health conscious San Franciscans (I'm sure you know Grass Valley has become a popular destination for this population) and their businesses, tourism, millions in property values, and the list goes on. The mine will destroy the majority of the reasons people are drawn to Grass Valley. More pavement, mine waste, loud noises, poorer air and water quality. This is definitely not the sort of environment we envisioned raising our sweet daughter in and I know many, many parents who feel the same way.

**Ind 460-3**

I am urging you NOT to approve Rise Gold's application to open the mine.

Sincerely,



Kristen Krauel-Privett





## **INDIVIDUAL LETTER 460: KRISTEN KRAUEL-PRIVETT**

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### **Response to Comment Ind 460-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 460-2**

Noise and vibration are addressed in Chapter 4.10, Noise and Vibration of the DEIR. Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 460-3**

Please see Master Responses 1 through 3. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.



Individual Letter 461

**From:** [Kristen Krauel](#)  
**To:** [hcbosupervisors](#)  
**Subject:** Please vote NO on the Idaho-Maryland Mine  
**Date:** Tuesday, February 22, 2022 3:18:10 PM

Unable to identify Dist

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Dear Nevada County Board of Supervisors,

My Name is Kristen Krauel-Privett, I live near the Empire Mine State Park in District 3 with my husband and our 13 month old daughter. I am a Licensed Clinical Social Worker (LCSW) for the Sierra Foothills Veterans Clinic in Auburn and my husband is a longshoreman out of the Port of Oakland. I am hoping that you will deeply consider my comments in regard to determining whether to approve the opening of the Idaho-Maryland Mine in Grass Valley.

Ind 461-1

Like a lot of families, our family chose to move to Grass Valley to be closer to nature and a natural way of life. My husband and I both grew up in remote Modoc County. We lost touch after high school but serendipitously reconnected after moving to San Francisco within weeks of each other for our jobs. After bringing our baby girl into the world, we knew we wanted to raise her in a community in which she would have the opportunity to cultivate a strong relationship with the outdoors and Mother Earth. Things we both feel benefited us tremendously growing up. An area in which she could safely walk or ride her bike about the neighborhood, raise animals, and enjoy the natural beauty of her surroundings while still maintaining access to a variety of medical care and shopping.

Unfortunately, we didn't learn of the potential opening of the Idaho-Maryland Mine until after we moved here. Had we known, we may not have taken the risk. We have dire concerns that the opening of the mine will result in higher noise levels, including vibration from blasting, and harm to the surrounding wildlife and natural settings. Our prior living in San Francisco made us all too aware of the negative impact high noise levels can have on one's quality of life. As a longshoreman, my husband experiences a detrimental level of noise and machinery related vibration on the job. This is yet another reason why we chose to move to Grass Valley, as working AND living in noise infested environments is not a healthy combination for my husband (nor anyone for that matter). His work, however, influenced him to immerse himself in learning about the negative impact of industrial vibrations on physical and mental health as well as various sound healing modalities.

Ind 461-2

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Ind 461-3

I am urging you NOT to approve Rise Gold's application to open the mine.

Sincerely,

Kristen Krauel-Privett



Sent from my iPhone



## **INDIVIDUAL LETTER 461: KRISTEN KRAUEL-PRIVETT**

---

### **Response to Comment Ind 461-1**

See Response to Comment Ind 460-1.

### **Response to Comment Ind 461-2**

See Response to Comment Ind 460-2.

### **Response to Comment Ind 461-3**

See Response to Comment Ind 460-3.



**Individual Letter 462**

**From:** Kristy Bennett <KristyAnneBennett@outlook.com>  
**Sent:** Saturday, April 2, 2022 4:30 PM  
**To:** Idaho MMEIR  
**Subject:** Please do not agree to this mine opening

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To: Matt Kelly, Senior Planner for the Nevada City Planning Commission

**Ind 462-1**

I was a helper at a deep rock mine years ago and there is no telling what type of horrible toxins are buried underground as I found out to my detriment and which I am still recovering from.

So, obviously, I have been very alarmed that the Nevada City Planning Commission is considering opening the Idaho Maryland Mine. I was in a chemical accident that could have been avoided if others had taken action prior to being exposed to toxic chemicals.

**Ind 462-2**

And it seems to me completely cruel to expose the Nevada County populace with what this mining firm has in mind. Not only the by the additional traffic on Brunswick road with large trucks, especially considering a large housing development is also going to impact Brunswick Road, but as well as dumping toxic waters into a stream.

**Ind 462-3**

So I ask you, from someone who has been almost killed by underground mine waters being dumped near me, to NOT ALLOW THEM TO POLLUTE OUR WATER, AIR OR OUR ROADWAYS. If you do so it will allow this firm to destroy out peaceful harmony and low pollution that we have here, just for the sake of money and a few jobs.

Sent from [Mail](#) for Windows





## **INDIVIDUAL LETTER 462: KRISTY BENNETT**

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### **Response to Comment Ind 462-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 462-2**

Traffic is addressed in Chapter 4.12, Transportation, of the DEIR. See Master Response 35 – Discharge to South Fork Wolf Creek. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 462-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 463**

**From:** [Tim](#)  
**To:** [BCS Public Comment](#)  
**Subject:** Rise Gold NOI  
**Date:** Saturday, February 26, 2022 4:10:10 PM

Dist 1

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**Ind 463-1**

The Science is clear, please don't allow the mine to reopen!

L. Tim Ackerman M.S.  
Nevada City CA 95959



## **INDIVIDUAL LETTER 463: L. TIM ACKERMAN**

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### **Response to Comment Ind 463-1**

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 464**

**From:** Laina Reynolds Levy <lainalevy@gmail.com>  
**Sent:** Monday, April 4, 2022 9:43 PM  
**To:** Idaho MMEIR  
**Cc:** Matt Levy; deircomments@cea-nc.org  
**Subject:** Comments on Rise Gold/ Idaho-Maryland Mine DEIR

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Dear Mr. Kelley and Planning Commission members,

My husband and I are homeowners on Anchor Lane in District 3, about 1/2 mile from the Brunswick mine site and within the mineral rights boundary of the project. We would like to register our concerns about the Draft EIR.

1) Wells Mitigation Plan

Appendix K.9, p.1 of the DEIR says that " All potentially impacted wells are located in the E. Bennett Road area. Domestic water wells outside this area will not be impacted." It is concerning, therefore, that in chapter 4.8, p.55 it states that the "Base Case" analysis conducted is only relevant within a 25-year period. However, the proposed project is requesting a permit to cover 80 years of mining activity, during which time the tunnels and impacts would presumably expand to additional sites within the mineral rights boundary.

Ind 464-1

Nowhere in chapter 4.8 does the DEIR discuss how the mining company would monitor for impacts on domestic wells outside of the very limited E. Bennett Rd study area should an unexpected or "worst case scenario" occur, despite the uncertainties inherent in mining in fractured bedrock. In fact, Appendix K.7 specifically calls out the inadequacy of the DEIR analysis, stating:

"it is possible that mining activities, including blasting, backfilling with CPB, and sealing of drains or areas of the underground workings, could activate leaching and groundwater flow in new subsurface areas, potentially resulting in impacts to neighboring wells (p.8);" and

"A major assumption is that flow contributions from the workings are distributed uniformly across the mining areas after correcting for depth. However, the subsurface distribution and orientation of bedrock fractures is not uniform and is subject to uncertainty. (p.12)"

We are concerned that our well, and those of our neighbors, could suffer dewatering as a result of mining activities. The DEIR does not adequately address uncertainties in the hydrology models over the 80-year period of the project nor does it provide a plan for establishing a baseline, monitoring, and mitigating impacts on all domestic wells within the mineral rights boundary.

2) Traffic and road safety

We drive our children to and from school along E. Bennett Rd and Brunswick Rd. every day. We would directly suffer the "significant and unavoidable" consequences of the 428 additional daily truck and vehicle trips generated by this project (Chapter 4.12, p. 34). In addition, our key fire evacuation routes include the Brunswick/Sutton Rd. intersection and the Brunswick/Hwy 174 intersection, both of which are foreseen to suffer significant increases in congestion, queues and wait time.

Ind 464-2

We believe that the DEIR chapter 4.12 fails to appropriately analyze and provide mitigations for the impact of additional truck and vehicle traffic on the safety of residents in the (very likely) scenario of a wildfire or other emergency evacuation along the identified road segments and intersections. On page 92, it discusses emergency vehicle access to the mining site on Brunswick Rd, but does not discuss how increased traffic along impacted roads will slow down firetrucks and other emergency vehicles access to homes in a wildfire situation.



**Ind 464-3**

For these reasons, we urge the members of the Planning Commission to require that the DEIR be revised to include  
1) a more thorough and accurate assessment of the potential impacts on groundwater and domestic wells within the entire mineral rights boundary over the 80-year project lifespan, and  
2) a traffic analysis that includes the safety of traffic flows in an emergency scenario such as a wildfire evacuation.

Thank you for your consideration,  
Laina and Matt Levy  
Anchor Ln  
Grass Valley, CA

—  
Laina Reynolds Levy  
lainalevy@gmail.com (415) 216-5797





## INDIVIDUAL LETTER 464: LAINA LEVY

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### Response to Comment Ind 464-1

The commenter is concerned that its well could be impacted by the mining project and asserts that the DEIR does not adequately address uncertainties in the groundwater models. The groundwater model was based on the expected mining plan during year one to year 25, and then Sensitivity Scenario 6 considered the significant expansion of mining in areas with potential for mineralization as shown in Figure 5.10 of Appendix K.3 of the DEIR for an additional 40 years of mining. As shown in Figure 5-12, and discussed on page 29 of the report, the 5-ft drawdown contour extent of Scenario 6 at the end of potential additional mining (to Year 65) relative to the 2019 water level expands less than 500 ft from that of the Base-Case Scenario. The drawdown contour of the Base-Case Scenario is at the end of the original planned future mining (Year 25) relative to the 2019 water level. The comparison of drawdown contours between Scenario 6 and the Base-Case Scenario suggests that the added potential mining (beyond the 65 years modeled) will not lead to large incremental drawdowns as the mining progresses because the mining activities occur in deep, low-K rocks. Please also see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Appendix K.7 contains the West Yost peer review of the applicant's draft technical reports. West Yost comments in the peer review were satisfactorily addressed during the preparation of the DEIR.

As stated on page 4.8-48 of the DEIR, blasting or backfilling with CPB would be conducted exclusively within the underground mine workings. Thus, any water that contacts those components would be present only within the mine workings and would be pumped out of the mine workings by the dewatering system. As a result, that water would not have the potential to flow into the fractured bedrock and flow toward any domestic supply wells. The dewatering causes a low pressure area around the underground workings such that groundwater inflow is toward the mine, not from the mine toward the domestic wells. The primary residual components of the ammonium nitrate-fuel oil (ANFO) used for blasting, ammonia and nitrate, are very soluble and mobile in water. This means that any blasting residuals would be continually removed from the mine over time through the dewatering system. The proposed WTP is designed to treat ammonia and other blasting residuals that might occur due to incomplete detonation. Thus, when the mine is allowed to flood again following the completion of mining, there is no reasonable potential that residuals from former blasting activities would cause a violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. In addition, the proposed new mining activities would all occur at depths that are comparable to or much deeper than the historic mine workings. Most of the proposed additional mining, and potential exploration and expansion into new areas, would occur below depths of 1,000 feet (1,600 feet msl), a depth below the levels of the existing domestic supply wells (see Table 2-2, Itasca, 2020). The substantial reduction in hydraulic conductivity at those depths, compared to the depths of the domestic supply wells, is further evidence that the proposed project would not adversely affect water quality in domestic wells. As stated on page 4.8-51 of the DEIR, the proposed mining areas would primarily be at equivalent or deeper depths than the existing underground mine workings, while the potential future expansion areas all involve mining at



greater depths, typically more than 1,000 feet below the surface and deeper. At those greater depths, the hydraulic conductivity is several orders of magnitude lower than it is at the depths of the domestic supply wells, due primarily to the lack of open fractures as a result of the large pressures exerted by the overlying rock mass (i.e., the lithostatic pressure). Given that the new mining activity would occur at equivalent or greater depths than the proposed mining, there is little or no potential for the proposed mining and mining in the future expansion areas to affect the quality of the groundwater in the domestic supply wells that are completed at much shallower depths.

The comment on page 12 of Appendix K.7 referenced by the commentor is in regard to Section 4.2.2 of the EMKO Report (Appendix K.2 of the DEIR), which describes a three-step procedure used to assess potential drawdown effects in perimeter areas. The results of this three-step procedure are not used for the prediction of groundwater drawdown and impact analysis. Rather the groundwater model prepared by Itasca (see Appendix K.3 of the DEIR) is used for this prediction and analysis. Discussion of this uncertainty and the overall uncertainty of the model predictions with respect to groundwater level impacts on individual wells was provided in the final version of Appendices K.2 and K.3, as requested in the West Yost peer review (page 12 of Appendix K.7).

### **Response to Comment Ind 464-2**

Please see Master Response 5 - Evacuation Zones. While the DEIR concludes that the proposed project would have a significant and unavoidable impact to the SR 174/Brunswick Road intersection, there are a few important factors to consider. First, the commentor would have other available evacuation routes, such as Idaho-Maryland Road. Second, Mitigation Measure 4.12-1(b) of the DEIR requires the applicant to enter into a Traffic Mitigation Agreement with the County regarding the SR 174/Brunswick Road intersection. The Agreement shall require the applicant to pay the project's fair share contribution toward the improvements necessary to improve intersection operations to an acceptable level. The Agreement shall include the fair share calculations and total payment amount. Based on the Caltrans methodology to assess fair share, it is estimated that the fair share percentage is 14.9%. While the project is contributing toward addressing its contribution of traffic to the SR 174/Brunswick Road intersection, the remaining funding needed to improve the intersection (e.g., signalization) is not yet certain, nor secured. As a result, the DEIR conservatively concludes that the impact would remain significant and unavoidable.

The project's cumulatively considerable incremental contribution to the queue impact at Brunswick Road/Sutton Way intersection could be addressed simply by retiming the intersection, as required by Mitigation Measure 4.12-10 of the DEIR. However, because this intersection is located within the City of Grass Valley, Nevada County cannot require the City to retime the intersection. As a result, the DEIR conservatively concludes that the impact would be significant and unavoidable. However, if the City of Grass Valley agrees to retime the Brunswick Road/Sutton Way intersection, the project's incremental contribution to the cumulative queue impact would be eliminated.

### **Response to Comment Ind 464-3**

Please see Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 5 - Evacuation Zones.



**Individual Letter 465**

**From:** [Cecilia Reynolds](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** Mine Re Opening  
**Date:** Thursday, March 31, 2022 9:36:32 AM

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**Ind 465-1**

I am opposed to the Idaho Maryland Mine reopening. Our future lies in tourism, recreation and maintaining the rural quality of life for which so many of us have moved. Promises by developers are rarely kept in full. The history of this developer is spotty and claims are not to be believed. If there is some environmental damage or disaster, what is to keep them from abandoning the project and keeping the prosecution and fining in the courts for years and years?  
Do not approve this project. It is not in keeping with our community's best interests.  
LaMont Reynolds



## **INDIVIDUAL LETTER 465: LAMONT REYNODS**

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### **Response to Comment Ind 465-1**

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 466

Dist 1

**OPPOSE**  
~~I~~ **re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name **Mr. Lanny L. Netz**  
Address **13894 Collier Rd.**  
**Grass Valley, CA 95945**

**RECEIVED**

FEB 22 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Phone  
Email Address **LANNY.NETZ@GMAIL.COM**

Ind 466-1





## **INDIVIDUAL LETTER 466: LANNY NETZ**

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### **Response to Comment Ind 466-1**

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 467

IDAHO-MARYLAND MINE PROJECT  
DRAFT EIR COMMENT FORM

APR 01 2022

Nevada  
County Planning  
Department

To document the author of comments received, please provide the following information. Thank you.

Name: Larik Butyrin

Address: 20205 Wolfcreek Rd. G.V. CA, 95949

Organization (if applicable): \_\_\_\_\_

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

**Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 95959-8617  
Idaho.MMEIR@co.nevada.ca.us**

RECEIVED  
APR 01 2022  
NEVADA COUNTY  
PLANNING DEPARTMENT

Ind 467-1

The E.I.R. has many flaws as pointed out by many professionals in many fields at the meeting on March 24th and what has been written in the Union. The biggest omission in the EIR, is the people of this community which are the most important part of the environment here!

If the majority of the community feels that this proposed project has a negative effect on their quality of life then there is nothing more to do other than to tell Rise Gold to GO AWAY!!! The planning dept. and our representatives have the obligation to do what the community wants!!! NUPF said!!!

*Larik Butyrin*



## **INDIVIDUAL LETTER 467: LARIK BUTYRIN**

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### **Response to Comment Ind 467-1**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.



**Individual Letter 468**

**From:** [Patsy Rieger](#)  
**To:** [hcbosupervisors](#)  
**Subject:** Rise Gold proposal to reopen mine  
**Date:** Friday, February 25, 2022 10:36:51 AM  
**Attachments:** Scan\_0002.pdf

Dist 1

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Dear Nevada County Supervisors:

**Ind 468-1**

Our home is located within the possible affected area, if the Idaho Maryland Mine is allowed to reopen. We have lived on this property for 35 years. We are extremely concerned about the proposal to reopen the mine because we depend solely on water provided by our well. We have seen studies showing that the mine operations propose to drain the groundwater for miles/acres including under our property located close to the Nevada County Airport.

Please take note of the devastating effects that could be put upon our residential and business community. We strongly oppose the proposal to reopen the mine.

**Ind 468-2**

Attached is a copy of the recently received postcard that came with misleading propaganda from Rise Gold.

Thank you for your consideration,

Larry & Patsy Rieger  
13026 Madrona Lf Ct  
Grass Valley CA 95945  
(530) 273-1473



## **INDIVIDUAL LETTER 468: LARRY AND PATSY RIEGER**

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### **Response to Comment Ind 468-1**

Please see Master Responses 13 through 15 regarding groundwater. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 468-2**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 469**

Nevada County Supervisors

March 31, 2022

950 Maidu Avenue  
Nevada City, CA 95959

**To:** Nevada County Board of Supervisors

**From:** Laura Wagner Balch and Gary Balch

Citizens of Nevada County, District 5

18286 Nubian Way

Nevada City CA 95959

To Whom it May concern:

**Ind 469-1**

As long-term residents of Nevada County, we are writing about our concerns about the reopening of the Idaho Maryland Mine, outside Grass Valley, Ca.

Mining helped make our community what it is today, but the mining days are over. Today, Nevada County is a home and destination for people who like the Northern California lifestyle. Today, Nevada County is a home and destination for its beautiful scenery, mostly amiable community, and its many cultural amenities.

Reopening this mine would cause considerable environmental, financial, and life-style disruptions which we cannot afford. The recent Draft Environmental Report (DEIR) raises many of these concerns and neglects others.

**Ind 469-2**

First, we could not find any alternative proposals for the use of this land, other than mining. We think the Board of Supervisors should consider our communities' needs for affordable housing, light industry, and parks to make this space accessible and useful to all residents.

**Ind 469-3**

Second, the DEIR fails in our view to adequately address the ground and waste water issues which this mine would create. California is already experiencing a drought and the mine would not only use water needed for other activities, but would negatively impact ground water in Wolf Creek, which flows beside numerous homes in Grass Valley and below. It is not clear in the report how mine waste is to be realistically dealt with, particularly with asbestos and heavy metals to be disposed of.

**Ind 469-4**

Third, the mine would significantly impact travel in Grass Valley and on Highway 174, where traffic is already congested. Heavy trucks with diesel emissions will impact the air and the noise will be disruptive to the quality of life for people who live in Grass Valley and the surrounds. Although a site has been identified for dumping mine waste, this will severely impact the neighborhood and it is not clear how that waste will be cleaned up and disposed of in an environmentally sensitive manner.

**Ind 469-5**

Fourth, the Mine Watch coalition has identified some issues in the draft DEIR which mitigate against pursuing Rise Gold's plans. Some of these include: the aesthetic impacts, air quality impacts from a moisture cloud plume, evening blasting impacts and the threat of airborne pollutants, all of which mitigate against opening this mine.



Ind 469-6

We are grateful to the County Board of Supervisors for their careful study of the prospects for reopening the Idaho Maryland mine and humbly suggest that mining of this type should occur only be considered in isolated areas where there is little impact on the quality of life of nearby residents. Instead, the Nevada County Supervisors should consider an alternative use of this site, more suitable to the needs of Nevada county in the 21<sup>st</sup> century.

Thank you for your time.

Sincerely,

Gary S. Balch at [garyb@eccnc.com](mailto:garyb@eccnc.com)

Laura A. Wagner-Balch at [laura.wagner.balch@outlook.com](mailto:laura.wagner.balch@outlook.com)

18286 Nubian Way  
Nevada City, CA 95959



## **INDIVIDUAL LETTER 469: LAURA BALCH**

---

### **Response to Comment Ind 469-1**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 469-2**

Alternatives are addressed in Chapter 6, Alternatives, of the DEIR. The CEQA Guidelines provide the following guidance for discussing alternatives to a proposed project:

- An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6[a]).

An alternative to the proposed mining use would not achieve any of the basic objectives of the project. Project objectives are identified starting on page 3-11 and repeated on starting on page 6-2 of the DEIR. Therefore, an alternative to the proposed mine is not required to be analyzed.

The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 469-3**

Please see Master Response 16 – Drought and Climate Change. Please see Master Responses 8, 10, and 12 regarding mine waste and Master Response 35 – Discharge to South Fork Wolf Creek. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 469-4**

Traffic is addressed in Chapter 4.12, Transportation, of the DEIR. Air quality and noise are addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, and Chapter 4.10, Noise, of the DEIR. Please see Master Responses 8 through 12 regarding mine waste. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 469-5**

Please see Response to Comment 7-95. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 469-6**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 470**

To: Matt Kelley, Senior Planner Nevada County Planning Department  
[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)  
Cc [DEIRcomments@cea-nc.org](mailto:DEIRcomments@cea-nc.org)

**Ind 470-1**

I am Laura Gagliasso, at 14035 Diamond Ct., Grass Valley 95945. I am one of "the 30" well owners in District 3 who are listed as impacted by the proposed Idaho-Maryland Mine project. I have been at this property 8 years with a lifetime in the area. My husband and I are retired and on a fixed income.

**Ind 470-2**

These are my comments on what I consider the inadequacies of the DEIR as it pertains to my property and well.

Allowing Rise Gold to self monitor is inadequate.  
There are 2 wells on the mine property. Those 2 wells plus the 30 wells should be monitored, with water quality testing, by an independent entity for 12 months BEFORE any dewatering begins in order to determine average depths and flow. A new and recent model needs to be established. What provision is there for beyond the 30...there are 300+ wells within the mining rights. Rise Gold used a 1996 model to make their predictions and, clearly, after extended drought seasons a model that is over 16 years old is inadequate.

The provision to provide water to "the 30" current property owners is inadequate. That provision should go with the property, not just the current owner or it will impact property values.

There is no true enough predictability of weather or groundwater levels and according to The Nature Conservancy, March 14, 2022, "ground water supplies nearly half the world's drinking water and supports farms that feed us." 38% of the drinking water in the USA comes from groundwater.

**Ind 470-3**

On February 10, 2022, at an NID meeting there was a map showing the truck route down E. Bennett Rd. to the back side of the Centennial site. I have seen no traffic study showing that usage on narrow and curvy E. Bennett Rd. Also, it showed a road cut into the Centennial site right at the very dangerous curve on E. Bennett Rd. across from the old mill. Where is the traffic study for large semi trucks using that route everyday? This is an inadequacy in the DEIR.

**Ind 470-4**

What if: They run a water line to my home but right now the well is fine? What if, right now I choose not to hook up to NID and later my well fails? Why should I have to hook up beforehand? What if the well never would have failed? Predicting the future using inadequate models is inadequate. I do not want my well capped.

**Ind 470-5**

Finally, I would like to ask...Has anyone bothered to walk or drive UP Diamond Ct. from E. Bennett Rd...and UP is the operative word? This is a single lane private road. One owner has the land on both sides all the way UP. There are 3 properties at the top. Has anyone bothered to come UP my driveway to my home on the back corner to the property where the well is



↑ located on the back side of the home? Again, UP is the operative word and there is no egress on either side of the driveway. It is not a simple thing to say that NID will swoop in and hook my property up to their water supply. It is inadequate of the DEIR to say so.

Thank you for your consideration of these comments concerning a project of this scope that will impact this entire community, not just 30 well owners.

Laura Gagliasso  
Donald Gagliasso  
14035 Diamond Ct. Grass Valley 95945  
[lmgagliasso@comcast.net](mailto:lmgagliasso@comcast.net)





## **INDIVIDUAL LETTER 470: LAURA AND DONALD GAGLIASSO**

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### **Response to Comment Ind 470-1**

The comment does not address the adequacy of the DEIR but is noted for the record.

### **Response to Comment Ind 470-2**

Domestic water wells in the E. Bennett area are proposed to be mitigated by the installation of NID potable water. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring. The commenter asserts that self-monitoring is not acceptable but does not explain why. The County will have oversight and enforcement authority over all mitigation measures and conditions of approval.

The DEIR did not use a 1996 model to make predictions of groundwater drawdown. Please see Chapter 4.8 of the DEIR. With regard to adequacy of groundwater modeling, mitigation, and payment of water charges after sale of a property please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

Regarding property values, please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 470-3**

No trucking is proposed on E. Bennett Road. Please see Figure 3-13 of the DEIR. No new roads are proposed to be constructed off of E. Bennett Road.

### **Response to Comment Ind 470-4**

As described in the Well Mitigation Plan (Appendix K.9 of the DEIR), the applicant will close property owners' wells, using certified well drillers and under Nevada County regulations, if requested by the landowner at the time of NID connection and service to their properties. It is unlikely that the reduction in water column of wells in the E. Bennett area will make these wells unusable. Therefore, property owners may decide to retain and continue using their water wells. The applicant will not close domestic water wells in the future if property owners decline this closure at the time of NID potable water connection. A water meter will be installed at property lines and connected to homes if requested and authorized by property owner. A property owner could therefore choose to use NID potable water at any time, even if they decide to continue using their domestic water well. The Well Mitigation plan has been revised to include the installation of Double Check Valves, which will allow the use of both wells and NID potable water service (Please see Appendix D to this Final EIR). If a property owner decides to retain and continue using their water well, the cost of the well's operation, including Double Check Valve monthly fees, would be the owner's responsible and not the applicant.

### **Response to Comment Ind 470-5**

Mitigation Measure 4-8(c) requires the engineering and permitting of the NID potable water extension prior to dewatering. Engineering details of several lateral piping to individual properties will be determined during engineering. Engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.) A 20-foot public utility



easement is present on three side of the commenter's property, as shown on maps submitted with the Use Permit application and available at the links below.

<https://www.nevadacountyca.gov/DocumentCenter/View/33574/Pipeline-Easements-3---ADDED-392020>



**Individual Letter 471**

**From:** Laura Gerhart <lalliepie@outlook.com>  
**Sent:** Monday, April 4, 2022 7:45 AM  
**To:** Idaho MMEIR  
**Subject:** Idaho Mine Proposal DEIR Public Comment

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April 4, 2022

Matt Kelly, Senior Planner  
Nevada County Planning Department  
Idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelly,

Thank you and the Planning Department for your dedication to hearing from the general public about the potential of bringing industrial mining back to Nevada County. I am among those in strong opposition to the plan proposed by Ben Mossman and the company he represents, Rise Gold.

I own a home in one of the areas that will be most impacted by the reopening of the Idaho Maryland Mine. I have seen the DEIR and have been in on many intelligent conversations put forth by the MineWatch group regarding the inadequacies of the document. I support their requests for further study and review of the DEIR conclusions, and I am confident representatives of CEA and MineWatch have presented those far more eloquently than I could.

What I would like to add, given the history of Ben Mossman and the mining industry he represents, is that I have little faith in their commitment to fully implement the very long list of mitigations suggested in the DEIR to address the significant short and long range impacts the mine operation will impose on our community. This leaves us as citizens and tax payers to, at the very least, foot a large bill for oversight. I would like to see the final EIR estimate the costs of county oversight included as a factor. This, especially, given the already over-burdened public services in our county working on many other vital matters to keep us all safe.

Sincerely,

Laura Gerhart

Residence Address:  
11010 Brunswick Dr.  
Grass Valley, CA 95945

Mailing Address:  
PO Box 1202  
Cedar Ridge, CA 95924

Ind 471-1

Ind 471-2



## **INDIVIDUAL LETTER 471: LAURA GERHART**

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### **Response to Comment Ind 471-1**

The comment does not specifically address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 471-2**

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 472**

**From:** Laura LeBleu <laura.lebleu@gmail.com>  
**Sent:** Monday, March 28, 2022 5:06 PM  
**To:** Idaho MMEIR  
**Subject:** Voicing opposition to Rise Gold

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Dear Planning Committee,

**Ind 472-1**

My husband and I are members of District Three and are both extremely concerned about the social and environmental impacts the reopening of the Idaho-Maryland mine might have upon our community. Hard rock mining is the leading source of toxic waste in America—and it has no place in a peaceful residential community whose residents would suffer from relentless noise pollution and potential exposure to toxic elements.

**Ind 472-2**

In my profession as a business and technology writer/editor, I spend much of my time looking into the workings of organizations, particularly as it pertains to their commitment to corporate ESG (environmental, social, governance) impacts. I am sad to report that Rise Gold is the poster child for corporate malfeasance—from reckless pollution to the overpromising of job outcomes and underreporting of environmental impacts. To let them into our community would be a grave mistake, one that could negatively affect our area for generations to come.

**Ind 472-3**

Thank you for taking your time to read and respond to the citizens of Nevada County. I hope you know that the vast majority of residents want nothing to do with Rise Gold—surely there are other, less potentially damaging visions for the future of our county and our kids.

Sincerely,

Laura LeBleu  
John Ficarra  
10653 Douglas Lane  
Nevada City

--  
Laura LeBleu  
[917.693.9683](tel:917.693.9683)  
[Creative Portfolio](#)  
[LinkedIn Profile](#)





## **INDIVIDUAL LETTER 472: LAURA LEBLEU**

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### **Response to Comment Ind 472-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 472-2**

The comment does not address the adequacy of the DEIR. Please see Master Responses 2 and 3.

### **Response to Comment Ind 472-3**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 473**

**From:** Laura Pendell <laurapendell@hotmail.com>  
**Sent:** Monday, April 4, 2022 8:32 AM  
**To:** Idaho MMEIR  
**Subject:** I am against the mine

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Dear Co.Nevada.CA. US

I am against the mine. I think that in spite of what they say it would pose a serious health risk if not immediately then eventually.

Laura Pendell  
14140 Hogeland Ranch Road  
Penn Valley CA 95946

**Ind 473-1**



## **INDIVIDUAL LETTER 473: LAURA PENDELL**

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### **Response to Comment Ind 473-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 474**

**From:** Lauran Bloom <lauranbloom@gmail.com>  
**Sent:** Monday, April 4, 2022 1:52 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** No Mine

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The reopening of the mine will negatively impact the community in the following areas:

**Ind 474-1**

1. Location - The proposed re-opening, with its buildings that require multiple variances, is proposed in an established residential area. Not to mention it is very close to a school that is for children kindergarten through 8th grade. The mine wants to operate 24 hours a day. They will be blasting, dumping and hauling tons of rock from 6a - 10p. Residents will be unable to open their windows or enjoy the great outdoors due to the noise. The noise will make it difficult for the school to conduct classes. In addition they are not sure which way the wind will carry the dust and particles. Would you want your child inhaling this during recess?

**Ind 474-2**

2. Health and wellness. As noted, the proposed mine will be dumping and hauling tons of fill rock contains asbestos and silica each day. Once asbestos particles become airborne you have the danger of them being inhaled and causing Mesothelioma - a fatal asbestos lung cancer. We have no idea which way the wind will take these particles. While you may think this is just another "ambulance chaser" legal action - having watched a relative die from this disease and gasp for their last breath due to asbestos exposure at work - I can assure you this disease is no joke. This company will be exposing all our residents to this toxin. The company has also said the rocks and dirt hauled out can be used for local constructions projects. Really - what construction project is going to accept contaminated fill?

**Ind 474-3**

3. Water - We are in a substantial drought situation. They propose to pump out over one million gallons of ground water per day. When ground water from aquifers was depleted in Santa Clara county, they saw the ground sink as much as 13 feet in some area making the area unstable and causing damage to structures, roads and even dams. In addition depletion of ground water can impact peoples wells and make it harder for them to reach water as the water table will be lower. Many here are dependent on wells as their primary source of water. This depletion can also cause residents increased costs for treatment as the depletion of surface water can impact the quality of the remaining water. How will the depletion of water impact the health of our forests? We are already in a high risk fire area and have difficulty getting fire insurance. Any depletion of water will only make this worse.

**Ind 474-4**

The "treated" water will be pumped into Deer Creek. How will that affect that ecosystem? We have all see the holding ponds at the Empire Mine trying to make the water useable again and the disaster that is Lost Lake. Can we afford another Super-Fund site?

**Ind 474-5**

In closing, this is a foreign company who has had issues with not living up to their commitments. Who will be left holding the bag when for some reason they decide this project is not longer viable? Or, when the residents start getting sick from tainted ground water and polluted air? The damage will be done and they will be long gone. They are not the first who have tried this. Short term gains do not offset long term costs.



↑  
Sincerely,  
Lauran and Cy Rinck  
Grass Valley





## **INDIVIDUAL LETTER 474: LAURAN AND CY RINCK**

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### **Response to Comment Ind 474-1**

The commenter is concerned about the vicinity of a school to the project and the noise- and air quality-related impacts on children. The DEIR identifies the closest school to the project, which is the Montessori House of Children on The Burma Road located approximately 2,500 feet south of the Brunswick Industrial Site boundary. (DEIR, p. 4.3-62.) Sensitive receptors, including schools, are considered in the health risk assessment and impacts are less than significant after mitigation. (DEIR, p. 4.3-78.) The DEIR also found that noise-related impacts would be less than significant after mitigation, with the exception of the installation of a potable water line along East Bennett Road. (DEIR, 4.10-27, 31.)

### **Response to Comment Ind 474-2**

The commenter is concerned that the waste rock produced by the project will release asbestos and other toxic air contaminants. The DEIR and Health Risk Assessment (Appendix E.1) evaluates asbestos and silica emissions and determined the impacts to be less than significant after mitigation. (DEIR, p. 4.3-78.) The commenter is referred to Master Response 17 - Meteorological Data Used in HRA, Master Response 18 - Air Quality Thresholds, Master Response 21 - Conservatism of Silica Assumptions, and Master Response 22 - Conservatism of Asbestos Assumptions.

### **Response to Comment Ind 474-3**

The commenter is concerned that the project will impact both quantity and quality of the groundwater supplies, especially in the context of the drought. The commenter is also concerned about the impact of the project on the soil moisture which could affect vegetation. The DEIR found that the project would not significantly impact groundwater supplies and would not violate any water quality standard after mitigation. (DEIR, p. 4.8-41, 54.) The commenter is also referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 - Drought and Climate Change, Master Response 33 - Groundwater Dependent Vegetation, and Master Response 29 - Near Surface Workings.

Regarding the impact to vegetation, it can be reasonably concluded that the dewatering of the mine would not affect the available moisture for vegetation in the project area because the depth to groundwater is already below the typical rooting depths in higher topographic areas while adequate flows would occur in South Fork Wolf Creek and Wolf Creek to maintain groundwater levels in the lower topographic areas. (DEIR, p. 4.13-21.) The dewatering of mine would not, therefore, increase fire risk due to reduced groundwater levels.

### **Response to Comment Ind 474-4**

The commenter states that treated water would be pumped into Deer Creek but is likely referencing the discharge of treated water to South Fork Wolf Creek. The DEIR found that the project would not violate any applicable water quality standard after mitigation. (DEIR, 4.8-41.) The commenter is also referred to Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 - Flows in South Fork Wolf Creek

### **Response to Comment Ind 474-5**

The commenter references the Project Applicant and is concerned about reclamation following the project. Regarding the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.



The project requires an approved Reclamation Plan. To ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan. (DEIR, p. 4.6-24.) The commenter is also referred to Appendix C (Reclamation Plan) of the DEIR.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.



**Individual Letter 475**

**LAUREN ANDERSON / DESIGN**



**RE: Rise Gold**

**Matt Kelley**

Planning Commission

**Ind 475-1**

I wish to express my complete opposition to the proposed mine opening ! There are so many negative impacts for our area and community with almost nothing positive. I question their job numbers. Rise doesn't have anything adequate in the EIR to mitigate the negative impacts or solutions ...and self monitoring.....with their negative past record..... Really ?

**Ind 475-2**

I live on the south boundary of the proposed mine off Brunswick and our Home Owners Association was told by the Engineer for "Peters Well Drilling" at the last go around with "M Gold" we would definitely lose our water"....and it would take NID about two years to get us that water with the engineering, permitting and construction work to get water to us. Can NID guarantee us water ?

**Ind 475-3**

I have not been able to increase the height limit by three feet for my projects... Why allow them a 165 foot exemption with a completely out of place look ! ... not to mention, allowing the change in zoning. We didn't buy our property 30 years ago here for this. Don't let this happen !

**Ind 475-4**

The noise is something else I must mention... We were here with the lumber mill and the sound from the trucks and the beeping of the backing up all day was horrible. I can't imagine what the loading of the trucks and truck traffic will sound like.. ( up to 100 trucks from 6am to 10pm ) ! and for 80 years.

This is a beautiful residential area ... Look at the "Facts" and vote no.... !

Thank You



Lauren Anderson

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Lauren Anderson / Design 12940 Mink Court, Grass Valley, CA 95945 **530.273.2600**



## **INDIVIDUAL LETTER 475: LAUREN ANDERSON**

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### **Response to Comment Ind 475-1**

Please see Master Responses 1 through 3. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 475-2**

Please see Master Responses 13 through 15 regarding groundwater. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 475-3**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 475-4**

Noise is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 476**

**From:** [Lauren Drutz](#)  
**To:** [Idaho MMEIR](#)  
**Subject:** Re: Notice of Availability of a Draft Environmental Impact Report (EIR) and Notice of Public Meeting to Provide Comments on the Idaho-Maryland Mine Draft EIR  
**Date:** Wednesday, January 5, 2022 3:14:56 PM

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Ind 476-1

Hi Matt,

Yes I received your email. Thank you.

I have a new email address:

[lau@zebradesignworks.com](mailto:lau@zebradesignworks.com)

I appreciate you sending the EIR info for the Idaho Mine proposal.

Sincerely,  
Lauren Drutz

On Jan 5, 2022, at 1:40 PM, Idaho MMEIR <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)> wrote:

Good Afternoon Lau:

Yesterday, we sent out the Notice of Availability (NOA) of a Draft Environmental Impact Report (EIR) and Notice of Public Meeting to Provide Comments on the Idaho-Maryland Mine Draft EIR Project to all of the email addresses that we had record of who had submitted previous comments on the proposed project. The email was bounced back and returned as undeliverable. I wanted to try sending the NOA again, to see if you are able to receive it.

The Draft EIR, Notice of Availability and other project materials are now available for public review and download on the Nevada County website at: <https://www.mynevadacounty.com/3195/Idaho-Maryland-Mine---Rise-Grass-Valley>.

Thank you, and could you please let me know if you receive this email.

Thank you,

**Matt Kelley**





Senior Planner

<image001.jpg>

**Planning Department  
County of Nevada  
Community Development Agency**

950 Maidu Ave, Suite 170  
PO Box 599002  
Nevada City, CA 95959-7902

office 530.265-1423  
<https://www.nvnevadacounty.com/512/Planning-Department>

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*I am out of the office every other Friday as follows: 1/7, 1/21, 2/4, 2/18, 3/4....*

**PLANNING PUBLIC COUNTER NOTICE**

The Customer Service Counter for Nevada County CDA - Planning Department is open from 8:00am – 3:30pm for walk-ins and for appointments. To schedule an appointment with staff please contact the Planning Department at 530-265-1222 Option 2 or [planning@co.nevada.ca.us](mailto:planning@co.nevada.ca.us). If you have any questions about our services, please contact us by email at [planning@co.nevada.ca.us](mailto:planning@co.nevada.ca.us) or by phone at 530-265-1222 Option 2.

<EIR19-0001 Idaho-Maryland Mine DEIR NOA\_Final.pdf>



## **INDIVIDUAL LETTER 476: LAUREN DRUTZ**

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### **Response to Comment Ind 476-1**

The comment does not address the adequacy of the DEIR.



Individual Letter 477

**From:** Lauren Drutz <lau@zebradesignworks.com>  
**Sent:** Monday, April 4, 2022 4:13 PM  
**To:** Matt Kelley; Idaho MMEIR  
**Cc:** deircomments@cea-nc.org  
**Subject:** Idaho Maryland Mine Project Draft EIR comments

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Dear Mr Kelley,

I am writing to express my thoughts on the Idaho-Maryland Mine Project Draft EIR Project.

Ind 477-1

The DEIR states that "Rise Grass Valley Inc. entered into a Voluntary Cleanup Agreement (VCA; Docket No. HSA-FY18/19-014) with the Department of Toxic Substances Control (DTSC) for the voluntary cleanup of soil contamination on the Centennial Industrial Site" for problems from previous mining activities. These old problems have not been mitigated yet and the solutions to fixing these old problems have been linked to this DEIR. This seems quite backwards to me. The proposed Rise Gold plan to re-open the Idaho-Maryland Mine has many new environmental and health problems. Beginning a new project without first addressing and mitigating the existing problems is asking for trouble. The DEIR assumes that Rise will fix these issues sometime, and then takes an incredible leap of faith by saying that the environmental baseline for Aesthetics, Ag and Forestry Resources, Biological Resources, Hazards and Hazardous Materials and Wildfire "has been adjusted to reflect the reasonably anticipated conditions of the site following the remediation activities (CEQA Guidelines Section 15125(a))." This dangerous assumption allows prevents Rise from being held accountable for completing the VCA or doing so adequately.

Thirteen major concerns are minimized and rationalized by Rise in this DEIR.

Ind 477-2

I have commented on seven of these concerns. Following are excerpts in quotes from the DEIR, with my comments following or without quotation marks.

**Aesthetics:** "...the project would substantially degrade the existing visual character or quality of public views of the project sites or the site surroundings, or conflict with applicable zoning and other regulations governing scenic quality. Based on the above, a **significant** impact would occur." "...given the proposed heights of the structures and the permanent alteration of the views, the impact would remain **significant and unavoidable.**" Apparently, the DEIR is giving Rise a pass regarding degradation of aesthetics.

Ind 477-3

With respect to light pollution, section 4.1-3, the claim "All work at the Centennial Industrial Site would be done between 6:00 AM and 10:00 PM." appears to be in conflict with Table 3-7. From my perspective, loaders, trucks and building lights would add sources of light to a site where currently none exist. These two references from the DEIR appear to be contradictory. But then the DEIR rationalizes the increase in visual degradation by saying "...the proposed project would substantially degrade the character of the Centennial and Brunswick Industrial Sites, though they are zoned for industrial development and there are surrounding industrial land uses in the vicinity of the project sites. Therefore, the project's incremental contribution to the significant cumulative impact would be **cumulatively considerable and significant and unavoidable.**" I have to disagree. This is not an unavoidable impact. The cumulative impact is occurring because





↑	<p>successive projects are being approved using the same backwards logic. The DEIR could instead conclude that adding more light pollution and aesthetic degradation is not appropriate at the Rise site because it would contribute to the cumulative impact.</p>
Ind 477-4	<p>Figure 4.1-11 Viewpoint 6: Corner of Brunswick Rd and East Bennett Road. It appears that the Simulated Condition picture forgot that almost all of the existing and native trees are to be removed and replaced with species that a landscaper will decide as appropriate. See landscape diagram 3-17 as compared to Figure 4.1-11</p>
Ind 477-5	<p><u>Agriculture &amp; Forestry Resources:</u> The DEIR states “The potential loss of up to 25 acres of forest/timberland associated with the proposed project would equate to an approximately 0.0001 percent decrease in statewide timberland resources. This very small relative amount of forest/timberland loss that would result from the project is not substantial in terms of the overall resources in the state and is therefore considered less than significant for the purposes of this analysis. Once again, the DEIR reasons that such a small amount of lost forestland is not significant. Once again, I feel that I need to point out that little things, incremental acreages, small voices, all add up and make a difference, positive or negative, in the big picture.</p>
Ind 477-6	<p><u>Air Quality &amp; Greenhouse Gas Emissions:</u> The DEIR maintains that air quality and greenhouse gas emissions would be “less than cumulatively considerable”. “The proposed project is anticipated to result in increased electricity consumption of 16,513 MWh during the year of construction and 49,613 MWh annually during operations. Reclamation activity is not anticipated to create a substantial demand for electrical power. Although the project would increase electricity demand, the increased demand is not anticipated to conflict with PG&amp;E’s ability to meet the RPS requirements.” And “As mentioned above, global climate change is, by nature, a cumulative impact.” The DEIR also states “There is already a trend in Nevada County regarding increased energy efficiency. According to the Nevada County EAP, since 2010, Nevada County residents and businesses have saved 13,034,571 kWh of electricity and 163,282 therms of natural gas annually from PG&amp;E energy efficiency programs including Nevada City and Grass Valley customers.” Increased efficiency will be ensured in the future as cumulative development occurs due to compliance with the State’s robust energy efficiency requirements. For example, the 2019 CBSC has begun phasing in Zero Net Energy requirements by requiring residential projects to meet 100% of their electricity needs through rooftop solar. Cumulative residential development would include rooftop solar to meet 100% of each project’s electricity demand. In addition, pursuant to 2019 CBSC, new non-residential buildings associated with cumulative development are also required to be solar ready.”</p> <p>“Based on the above, implementation of the project in combination with other cumulative development would not result in the wasteful or inefficient use of energy. Because the project would not conflict with a local plan to increase energy efficiency and reduce energy consumption, a <i>less-than-significant</i> impact would occur.”</p>
Ind 477-7	<p>The DEIR points to positive “cumulative development” benefits of adopting energy efficient electricity sources within Nevada County, yet Rise has no part in contributing towards this goal! Instead, the DEIR points out that Rise will add to electricity demand.</p>
Ind 477-8	<p>The DEIR contradicts itself, stating “...global climate change is, by nature, a cumulative impact” and “...the project would increase electricity demand...” Then the DEIR calls them “less-than-significant” and provides a path for these negative impacts to be ignored.</p>
Ind 477-9	<p><u>Hydrology and Water Quality:</u> “The Idaho-Maryland Mine would have a surplus of water from the natural groundwater flow into the underground workings.” The DEIR ignores mega-drought and climate change in California. Water is scarce and not reliable. DEIR claims about water availability are not reality based. The claim that Rise will be buying water from NID is merely a hope and if there is any water to buy from NID or pump from aquifers, Rise Gold will be competing with existing local communities and businesses who are scaling back now due to drought and climate change.</p>
Ind 477-10	<p><u>Noise and Vibration:</u> Please see Table 3-7 “Hours of Operation” on page 3-37.</p> <p>It is disingenuous to claim that noise and/or vibration from the mine and its transport vehicles can be mitigated when mine operations are running 24/7 and trucks are hauling 7 days a week from 6AM to 10PM for 80 years, initial</p>
↓	



	<p>dewatering is occurring 24/7 for 6 months (what about post-initial dewatering?), underground exploration/mining is happening 24/7 for 7 days a week for 80 years and outside truck loading is going on 7AM-7PM 7 days a week for 80 years.</p>
Ind 477-11	<p><u>Transportation:</u> "The average transport of engineered fill would be 1,000 tons per day or 365,000 tons per year. A maximum transport rate of up to 2,000 tons of engineered fill per day is required to make up for periodic weather or operational delays. Truck payloads would be approximately 20 tons per truck and, therefore, would require up to 100 trips per day and an average of 50 trips per day."</p> <p>Negative impacts to our county include wear and tear on roads, exhaust pollution, increased traffic and broken windshields from haul trucks, dangerous conditions for local drivers as haul trucks enter and leave Rise sites throughout the day, extra chaos for emergency vehicles especially during fire season.</p>
Ind 477-12	<p><u>Wildfire:</u> "In the event of an evacuation order in the vicinity of the proposed mine, such as an evacuation of residents off of Greenhorn Road, the incident command center would contact dispatch and direct them to contact the mine and request the mine operator to shut down the mine and cease all truck hauling operations.<sup>6</sup> While Brunswick Road is not a primary evacuation route, it would be the evacuation route used by residents of the Greenhorn Road area to evacuate to the primary evacuation route of SR 49/20." Again, the DEIR has minimized the impact of Rise's operations on local residents during or in anticipation of an emergency evacuation.</p>
Ind 477-13	<p>"Overall, it can be reasonably concluded that the dewatering of the mine would not affect the available moisture for vegetation in the project area because the depth to groundwater is already below the typical rooting depths in higher topographic areas while adequate flows would occur in South Fork Wolf Creek and Wolf Creek to maintain groundwater levels in the lower topographic areas.<sup>10</sup> The dewatering would not, therefore, increase fire risk due to reduced groundwater levels." The forgoing statement is not taking into account drought and climate change. The DEIR is assuming adequate river and stream flows. However, this is not a given. The DEIR needs to include comprehensive and current data on groundwater, climate change and drought and refrain from discounting quality of life and safety issues for Nevada County residents.</p>
Ind 477-14	<p>"With limited exception, none of the infrastructure improvements would be expected to exacerbate wildfire risk. One exception is the extension of the overhead power line along Brunswick Road that would be extended onto the Brunswick Industrial Site, which would have the potential to exacerbate wildfire risk if the line comes in contact with tree limbs or other overhanging vegetation." Our community and California in general have experienced many fires resulting from power line ignitions. If Rise is serious about fire safety, they would put new power lines underground.</p>
Ind 477-15	<p>No consideration has been given to the proximity of Nevada County's air attack base on Loma Rica Drive to the Rise Gold Brunswick site. It is less than 1.5 miles away (as a plane flies). I think that this issue has been ignored with respect to first Standards of Significance 4.13.4. "Consistent with Appendix G of the CEQA Guidelines, Section XX. Wildfire, determination of significant impacts related to wildfire is based on whether the proposed project would result in the following, if located in or near state responsibility areas or lands classified as very high FHSZs:</p> <ul style="list-style-type: none"> <li>- Substantially impair an adopted emergency response plan or emergency evacuation plan."</li> </ul>
Ind 477-16	<p>Two lengthy paragraphs describing the fire-fighting resources at the Grass Valley Air Attack base are included by the DEIR but no remarks about how a conflagration at a Rise site could negatively impact fire-fighting aircraft due to smoke or from issues with stored or in-use explosives at the Rise facilities. The air attack base is an incredible resource for our community and Northern California. It needs to be accounted for by the DEIR.</p>





**Ind 477-17**

To write this letter, I have read through hundreds of pages of DEIR documents. It is obvious to me that most of the DEIR is weighted heavily on hopeful scenarios and assumptions so that Rise can push their project through the Planning Department.

The term "cumulative impact" has been misused throughout this DEIR. Apparently, only positive cumulative impacts are applicable to Rise, while negative cumulative impacts are allowed to be ignored or trivialized. Logic of this type discredits the DEIR document.

Thank you for your consideration.

Lauren Drutz



## **INDIVIDUAL LETTER 477: LAUREN DRUTZ**

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### **Response to Comment Ind 477-1**

The commenter states that the DEIR establishes an incorrect baseline by assuming the Centennial Industrial Site cleanup project will be completed. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

### **Response to Comment Ind 477-2**

The commenter states that the DEIR is “giving a pass” to the Project Applicant regarding aesthetic impacts, which were determined to be significant and unavoidable. A “significant and unavoidable impact” simply means that the DEIR has determined that a particular impact cannot be mitigated (or mitigation measures were infeasible) to a less than significant level. (DEIR, p. 5-9.) CEQA requires that the DEIR identifies significant and unavoidable impacts so that a lead agency is informed and can decide whether or not to approve a project, despite the significant and unavoidable impacts. (CEQA Guidelines § 15093.) The DEIR compiles all of the project’s significant and unavoidable impacts in Section 5.6.

### **Response to Comment Ind 477-3**

The commenter states that the DEIR contradicts itself with regard to light pollution. As shown in Table 3-7 of the DEIR, off-site hauling of engineered fill would be from the hours of 6:00 AM to 10:00 PM and placement, grading, and compaction of engineered fill would take place from the hours of 7:00 AM to 3:30 PM. Therefore, there is no conflict with Section 4.1-3 of the DEIR. As discussed in this section of the DEIR, the significance threshold is the creation of a new source of substantial light of glare which would adversely affect day or nighttime views. The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and a less-than-significant impact would occur.

As discussed in Section 4.1-4 of the DEIR, the project would create long-term changes in visual character associated with the proposed project in combination with cumulative development. The project’s incremental contribution to this significant cumulative impact is cumulatively considerable and significant and unavoidable. As discussed in Section 4.1-5 of the DEIR, creation of new sources of light or glare associated with the proposed project in combination with cumulative development is less than cumulatively considerable.

### **Response to Comment Ind 477-4**

The commenter states that one of the DEIR’s simulated vantage points (DEIR, p. 4.1-38, Viewpoint 6) fails to mention that all existing vegetation would be removed and replaced. Existing trees and vegetation in the northeast corner of the Brunswick site are not proposed to be removed by the project. The commenter is referred to Figure 4.4-10 of the DEIR.

### **Response to Comment Ind 477-5**

The commenter states that the DEIR understates the impact of from loss of acreage. The commenter is referred to Section 4.2-4 of the DEIR which explains how the significance of the project’s impact to cumulative loss of forest land or conversion of forest land to non-forest use was determined.

### **Response to Comment Ind 477-6**

The commenter provides excerpts from Chapter 4.3 of the DEIR. The comment is noted.



### **Response to Comment Ind 477-7**

The commenter states that the project would not contribute to energy efficiency goals within the County. The commenter is referred Master Response 25 - Nevada County Energy Action Plan.

### **Response to Comment Ind 477-8**

The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

### **Response to Comment Ind 477-9**

The commenter states that the DEIR ignores the current drought conditions. The commenter is referred to Master Response 16 - Drought and Climate Change.

### **Response to Comment Ind 477-10**

The commenter states that the noise and vibration impacts cannot be mitigated to less than significant but provides no additional detail. The DEIR discusses noise and vibration impacts from the project in Chapter 4.10. Noise impact determination pursuant to CEQA is based on measurable thresholds established by the jurisdiction. The project noise analysis contained in Chapter 4.10 of the DEIR appropriately determined impact significance by comparing the project's estimated noise levels against the County's numerical noise thresholds. While this approach may not satisfy the commenter, it is the legally required approach under CEQA. As stated in CEQA Guidelines Section 15064.7:

(a) A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant.

Specifically, for the topic of noise, Appendix G of the CEQA Guidelines identifies the following thresholds:

- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- b) Generation of excessive groundborne vibration or groundborne noise levels?
- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Furthermore, while the DEIR determined, based on best available data, that the project's operations would not result in noise levels that would exceed the above-listed thresholds, the DEIR conservatively concludes that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and the project's noise impacts could be significant. As a result, the DEIR includes Mitigation Measure



4.10-3, which requires implementation of a robust, ongoing noise monitoring program. The noise monitoring program shall evaluate noise levels at a minimum of five receptor locations surrounding the Brunswick Industrial Site. The noise monitoring system shall consist of the installation of permanent noise monitors at three to five locations on the Brunswick Industrial Site, and one site at the Centennial Industrial Site, to be determined by a third-party noise consultant under contract with the County, in coordination with the applicant. The permanent monitors shall be provided with a continual power source, and shall include internet connectivity technology, to enable electronic retrieval of noise monitoring data at any time by the County's third-party noise consultant. The County's third-party noise consultant is required to retrieve and evaluate mine-related operational noise levels within 30 days of commencement of mining, quarterly thereafter for the first five years, and then once per year thereafter for the life of the project. If noise levels are found to exceed the County's standards, then operation of the mine shall cease, until additional engineering controls can be implemented as needed.

#### **Response to Comment Ind 477-11**

The commenter states that traffic-related impacts will damage roadways and increase emissions, but does not state how the DEIR is inadequate in assessing these impacts. The DEIR discusses the traffic impacts of trucks, including impacts to pavement, in Chapter 4.12. Truck emissions are discussed in Chapter 4.8. The commenter also states that the project would impede an evacuation during an emergency. The commenter is referred to Master Response 5 - Evacuation Zones.

#### **Response to Comment Ind 477-12**

The commenter quotes from the DEIR and states that it minimizes the project's impacts on local residents during an emergency evaluation. However, the commenter does not provide any additional information regarding the adequacy of the DEIR on which to formulate a specific response. The commenter is referred to Master Response 5 - Evacuation Zones.

#### **Response to Comment Ind 477-13**

The commenter states that the DEIR does not consider climate change in connection to the project's impacts to private groundwater wells. The commenter is referred to Master Response 16 - Drought and Climate Change.

#### **Response to Comment Ind 477-14**

The commenter states that the DEIR should consider undergrounding a power line to abate fire risk. Mitigation Measure 4.13-2 requires a Vegetation Management Plan, including trimming of vegetation within specified horizontal distances from roadways and overhead power line(s), the latter of which may be implemented by PG&E as the service provider, consistent with clearance requirements in Public Resources Code Sections 4292 and 4293. Undergrounding the power line is not necessary because Mitigation Measure 4.13-2 reduces the impact to less than significant.

#### **Response to Comment Ind 477-15**

The commenter states that the project would impair the Nevada County air attack base. However, the commenter does not state how the project would impact the air attack base. The commenter is referred to Response to Comment Ind 477-16.

#### **Response to Comment Ind 477-16**

The commenter states that a fire at the project site would produce smoke that could interfere with operations at the Grass Valley air attack base. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or



economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.”

**Response to Comment Ind 477-17**

The commenter states that cumulative impacts are ignored or trivialized in the DEIR. Responses to specific comments have been provided above.





**Individual Letter 478**

March 22, 2022

**Ind 478-1**

We are writing to express our objection to the reopening of the Idaho- Maryland mine. We ask that you reject the proposal from Rise corporation. Nothing is to be gained for our community from their project.

We moved to Nevada County in 1988 and love this community. We were certainly aware of the area's mining history and enjoy the quaint celebrations of that fact.... people in period costumes, the tossing of the pasties and the connections to Cornwall etc. Nevada County's mining legacy is something which is charming only because it remains in the past and is thankfully no longer a current reality. We have learned more and more about mining's toxic legacy and destruction. The re-opening of any mine, even with modern technology, is full of risk and is no benefit to our community.

**Ind 478-2**

Hundreds of truck trips per day will increasingly pollute our air and, as you know, we can not afford to add more air pollution to our already poor air quality throughout much of the summer. Noise pollution will increase with mine activity and trucking. Water issues will be greatly impacted by mining needs. The Rise Corporation has a history of leaving toxic mess and not fulfilling obligations to clean up. There are too many unknown health impacts from this project.

**Ind 478-3**

We recognize that you are attracted by business and promise of job creation. However, we reject the notion that this is the way to achieve those goals. You only have to look at Truckee to see how tourism and recreational businesses will improve our economy and way of life. Support the creation of bike trails, attract more eco- businesses, develop a nature center or a museum. Continue to attract alternative energy companies and high tech businesses. That's how to increase jobs and tax revenue and also improve our communities. Mining will be a deterrent to any tourist, retiree, or remote worker.

**Ind 478-4**

Property values will plummet. Who wants to visit or reside in an area full of noise and air pollution?  
Who wants to move to a community that may have depleted or polluted water and possible contaminated soil?

**Ind 478-5**

We urge you to reject this project.

Thank you for your attention,

Laurie and Philip DesJardins

PO Box 2102 Nevada City CA 95959



## **INDIVIDUAL LETTER 478: LAURIE DESJARDINS**

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### **Response to Comment Ind 478-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 478-2**

Air quality is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR as well as in Master Responses 17 through 24. Noise is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Please see Master Responses 13 through 15 regarding groundwater. Please also see Master Responses 1 and 3. The commenter expresses general concerns regarding impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 478-3**

The comment does not address the adequacy of the DEIR. Please see Master Response 2.

### **Response to Comment Ind 478-4**

The comment does not address the adequacy of the DEIR. Please see Master Response 2.

### **Response to Comment Ind 478-5**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 479**

Laurie Dahm Segal  
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Nevada City, CA 95959  
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ldahmsegal@acsrddl.

March 27, 2022

Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902 (530) 265-1423

Dear Mr. Kelley,

I am a resident of Nevada City that was forced to evacuate my home during the Jones Fire. I have reviewed the DEIR for re-opening the Idaho-Maryland Mine and am very concerned about the GHG emissions that will be generated during the life of the project. Regarding Chapter 4.3 Air, Quality, Greenhouse Gas Emissions, and Energy I submit the following comment.

The DEIR proposes the use of Carbon Offsets in offsetting the project's construction GHG emissions.

4.3-7(b) Carbon Offsets – Construction Emissions. Rise Grass Valley Inc. (Rise) shall retire carbon offsets in a quantity sufficient to offset the project's construction greenhouse gas (GHG) emissions to below the 1,100 metric ton carbon dioxide equivalent (MT CO<sub>2</sub>e) per year construction threshold, consistent with the performance standards and requirements set forth below. Specifically, prior to Nevada County's (County) issuance of the project's first grading permit, Rise shall retire carbon offsets equaling 2,345 MT CO<sub>2</sub>e, which was calculated by subtracting 1,100 MT CO<sub>2</sub>e (threshold) from the construction emissions generated by the project.

I have the following comment to the proposed mitigation technique:

The California cap-and-trade policy is under review. Therefore, the proposed mitigation is in a state of flux. A second net-zero mitigation plan is warranted.

*"In January (2021), the program (cap-and-trade) entered a new phase that adds new requirements through 2030. These include doubling the rate at which the emissions cap drops and adding a price ceiling for credits to prevent costs for industries from increasing past a certain point." (2)*

*"California climate policy is already failing to reduce planet-warming emissions fast enough to meet the state's 2030 targets". (1) The cap-and-trade program "might be too weak to achieve California's ambitious climate goals". Therefore, hearings are taking place to determine "the extent to which the state's climate strategy should rely on the cap-and-trade program reductions relative to other approaches." (2)*

Ind 479-1



↑ “The cap-and-trade system in California was a pioneering initiative when it was established in 2013. But its goals look relatively modest next to the net-zero climate commitments being adopted by a growing number of states and businesses.” (3)

- 1) <https://calmatters.org/commentary/my-turn/2021/03/cap-and-trade-offsets-at-a-crossroads-in-californias-climate-policy/>
- 2) <https://www.kqed.org/science/1972789/california-says-it-will-review-cap-and-trade-amid-growing-criticism>
- 3) <https://www.eenews.net/articles/price-hike-marks-new-era-for-calif-cap-and-trade/>

Sincerely,

Laurie Dahm Segal



## INDIVIDUAL LETTER 479: LAURIE SEGAL

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### **Response to Comment Ind 479-1**

The project would not be a covered entity under the State's Cap-and-Trade program, as described in the California Air Resources Board's *Cap-and-Trade Instructional Guidance*<sup>3</sup> (2012):

Starting in 2012, major GHG-emitting sources, such as electricity generation (including imports), and large stationary sources (e.g., refineries, cement production facilities, oil and gas production facilities, glass manufacturing facilities, and food processing plants) that emit more than 25,000 MT CO<sub>2</sub>e per year will have to comply with the Cap-and-Trade Program. The program expands in 2015 to include fuel distributors (natural gas and propane fuel providers and transportation fuel providers) to address emissions from transportation fuels, and from combustion of other fossil fuels not directly covered at large sources in the program's initial phase.

In addition, per the California Air Resources Board's *Draft 2022 Scoping Plan, Appendix D – Local Actions*:

Over the years, agencies and courts have provided direction and guidance regarding GHG mitigation. Nevertheless, given the variety of potential projects and mitigation scenarios, some uncertainty and misconceptions persist. For example, when lead agencies consider offsite GHG mitigation (including offsets), they may sometimes conflate the requirements for compliance-grade offsets in California's Cap-and-Trade regulation with the requirements for GHG mitigation measures under CEQA. The Cap-and-Trade regulation requires that compliance offsets meet certain regulatory criteria, which specify that compliance offsets must be real, additional, quantifiable, permanent, verifiable, and enforceable. In general, the State's Cap-and-Trade Program restricts compliance offsets from being used for any purpose other than Cap-and-Trade compliance, including being used as mitigation under CEQA [emphasis added].

The project does not emit 10,000 MT of CO<sub>2</sub>e per year and is not subject to the Mandatory Reporting Regulation since it does not result in more than 25,000 MT CO<sub>2</sub>e per year. See CARB regulations for the mandatory reporting of GHG emissions on page 4.3-29 of the DEIR. The project is not a covered entity under Cap-and-Trade, and therefore Cap-and-Trade offsets cannot be used as mitigation for the project.

The commenter suggests that the project should purchase offsets such that the lifetime emissions would be net zero. However, there is no requirement that a project reduce greenhouse gas emissions to net zero. Notably, the lead agency has determined that the threshold of significance for the project is 1,100 MT CO<sub>2</sub>e per year for construction and 10,000 MT CO<sub>2</sub>e per year for operations, based on substantial evidence provided in the DEIR (please see Master Response 27, GHG Thresholds). These thresholds are based on annual GHG emissions, rather than life cycle emissions of a project, which the commenter suggests the project's impacts should have been evaluated on. However, life cycle emissions are not required to be assessed under CEQA (please see Master Response 26, Life Cycle GHG Emissions). Since the project would result in GHG emissions during construction that would exceed the applied threshold of 1,100 MT CO<sub>2</sub>e per year, mitigation has been applied to reduce emissions to a less than significant level. For operations, the GHG emissions do not exceed the applied threshold during any of the years of activity and therefore, no mitigation was required. CEQA does not have a requirement for a project to mitigate beyond the threshold.

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<sup>3</sup> <https://ww2.arb.ca.gov/sites/default/files/cap-and-trade/guidance/chapter1.pdf>





In addition, the project's GHG inventory in the DEIR makes conservative assumptions for GHG emissions over the life of the project. As shown in Table 22 of Appendix E.1, for the Year 2033 to 2102 Scenario, PG&E supplied electricity makes up the majority (51%) of GHG emissions from the project at 4,636 metric tons. GHG emissions from electricity are calculated based on an intensity factor of 204 pounds per MWh. These values will decrease over time due to the Renewable Portfolio Standard but were used for all scenarios as a conservative estimate (see page 347 of Appendix E.2). On-road vehicles – Off-Site makes up a large part (35%) of GHG emissions from the project at 3,123 metric tons. These emissions are primarily generated by haul trucks which are assumed to deliver engineered fill at an average distance of 60 miles (see page 246 of Appendix E.2). As heavy trucks and passenger vehicles are eventually transitioned to battery-electric vehicles under State policy, these emissions will likely be less than assumed in future years.



**Individual Letter 480**

Laurie Dahm Segal  
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Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902 (530) 265-1423

March 27, 2022

Dear Mr. Kelley,

I am a resident of Nevada City that was forced to evacuate my home during the Jones Fire. I have reviewed the DEIR for re-opening the Idaho-Maryland Mine and am very concerned about the GHG emissions that will be generated during the life of the project. Regarding Chapter 4.3 Air, Quality, Greenhouse Gas Emissions, and Energy I submit the following comment.

**DEIR Table 4.3-23 Estimated Annual Greenhouse Gas Emissions (Metric Tons) Year 2033 to 2102 – Mining, Brunswick Industrial Site Operations, Fill Placement at Off-Site Location** provides an entry of **9,041.23** of **Total Annual Emissions (Metric Tons)**. *The GHG Threshold used is 10,000. Additionally, a No is provided in assessing Significance (Yes/No)?*

My comment is two-fold

- 1) 10,000 MT CO<sub>2</sub>e per year is the quantitative threshold used by SMAQMD, PCAPCD, BAAQMD and SCAQMD as cited in the four bullets on *DEIR Page 4.3-42/43*. The 10,000 MT CO<sub>2</sub>e per year threshold is based on the CEQA Guide December 2009, Revised November 2014, May 2015, April 2020<sup>1</sup>,

CEQA revisions coincide with updates from the CARBs' Climate Change Scoping Plan. *The 2017 Scoping Plan serves as the framework for reaching targets established by SB 32 – that emissions be 40 percent below 1990 levels by 2030. This is needed to keep California on a trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80 percent below 1990 levels by 2050 as set forth in EO S-3-05 (DEIR Page 4.3-28).*

Targets have not been set for beyond 2050, therefore a conclusion that the Significance is **No** for years 2051 – 2102 should not be assumed. In fact, *“California climate policy is already failing to reduce planet-warming emissions fast enough to meet the state’s 2030 targets”*.<sup>2</sup> Workshops are currently being

Ind 480-1



held as CARB prepares its' 2022 Scoping plan for achieving carbon neutrality by 2045.<sup>3</sup>

<https://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable4-2020.pdf><sup>1</sup>

<https://calmatters.org/commentary/my-turn/2021/03/cap-and-trade-offsets-at-a-crossroads-in-californias-climate-policy/><sup>2</sup>

<https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan><sup>3</sup>

- 2) **Sixty-seven** years of being >90% of GHG target emissions for a project should be considered **Significant**. Nevada County, located in the MCAB, is already experiencing extreme effects of climate change as documented in the three bullet points on *DEIR Page 4.3.16*.

The IPCC Sixth Assessment Report (28 February 2022)<sup>3</sup> implores that urgent action is required to deal with increasing risks. *Hoesung Lee states that "It (the report) emphasizes the **urgency of immediate and more ambitious action to address climate risks. Half measures are no longer an option.**"* Approving a project that increases GHG emissions for the next 67 years in Nevada County will only accelerate the affects of climate change already being experienced - higher temperatures, less water, more fires, etc.

<https://www.ipcc.ch/report/ar6/wg2/resources/press/press-release/><sup>3</sup>

Sincerely,

Laurie Dahm Segal

Ind 480-2



## **INDIVIDUAL LETTER 480: LAURIE SEGAL**

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### **Response to Comment Ind 480-1**

The commenter states that the DEIR should not assume a less than significant impact for project years beyond 2050 because GHG emission reduction targets have not been set beyond year 2050, and that California policies are failing to meet GHG emission reduction targets for 2030. As GHG emission reduction targets for years subsequent to 2050 have not yet been established in California, the DEIR cannot compare the project to those targets and any analysis based on hypothetical targets would be mere speculation. CEQA does not require an EIR to analyze speculative impacts. (see CEQA Guidelines Section 15384.)

Notably, the lead agency has determined that the threshold of significance for the project is 1,100 MT CO<sub>2</sub>e per year for construction and 10,000 MT CO<sub>2</sub>e per year for operations, based on substantial evidence provided in the DEIR (please see Master Response 27, Greenhouse Gas Thresholds). Since the project would result in GHG emissions during construction that would exceed the applied threshold of 1,100 MT CO<sub>2</sub>e per year, mitigation has been applied to reduce emissions to a less than significant level. For operations, the GHG emissions do not exceed the applied threshold during any of the years of activity and therefore, no mitigation was required. CEQA does not have a requirement for a project to mitigate beyond the threshold.

In addition, the project's GHG inventory in the DEIR makes conservative assumptions for GHG emissions over the life of the project. As shown in Table 22 of Appendix E.1, for the Year 2033 to 2102 Scenario, PG&E supplied electricity makes up the majority (51%) of GHG emissions from the project at 4,636 metric tons. GHG emissions from electricity are calculated based on an intensity factor of 204 pounds per MWh. These values will decrease over time due to the Renewable Portfolio Standard but were used for all scenarios as a conservative estimate (see page 347 of Appendix E.2). On-road vehicles – Off-Site makes up a large part (35%) of GHG emissions from the project at 3,123 metric tons. These emissions are primarily generated by haul trucks which are assumed to deliver engineered fill at an average distance of 60 miles (see page 246 of Appendix E.2). As heavy trucks and passenger vehicles are eventually transitioned to battery-electric vehicles, these emissions will likely be less than assumed in future years. Likewise, any changes in California law or regulation that are subsequently approved to meet new targets developed for post-2050 emission reduction targets would be applied to the project where applicable; however, those changes are speculative and cannot be accurately analyzed in the DEIR.

### **Response to Comment Ind 480-2**

The commenter asserts that the project's operational GHG emissions should be considered significant because they are over 90% of the applicable threshold. Impacts are considered significant when they exceed the applicable threshold, and the project's operational GHG emissions do not exceed the threshold selected by the County, based on substantial evidence. As such, the project's operational GHG emissions are considered less than significant. Please see Master Response 27 - Greenhouse Gas Thresholds, and see Response to Comment Ind 480-1.



**Individual Letter 481**

**From:** Karin Wheatley <[kwheatley18@gmail.com](mailto:kwheatley18@gmail.com)>  
**Sent:** Monday, April 4, 2022 7:49 AM  
**To:** Idaho MMEIR  
**Subject:** Fwd: Letter

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----- Forwarded message -----

**From:** Bob Wheatley <[robertwheatley1099@gmail.com](mailto:robertwheatley1099@gmail.com)>  
**Date:** Sat, Apr 2, 2022, 8:16 PM  
**Subject:** Letter  
**To:** Karin Wheatley <[kwheatley18@gmail.com](mailto:kwheatley18@gmail.com)>

10591 Salcido Lane  
Grass Valley  
916.432.0409 (Call/Text)

Dear Mr. Kelly

Idaho-Maryland Mine Project SCH# 2020070378 Draft Environmental Impact Report

I am writing as a co-owner, with my three sisters, the property at 10591 Salcido Lane to express my concern on aspects of this project.

I am particularly concerned at the content of tables 4.4-5 and 4.4-6 which omit flora, fauna and avian species identified at the recent hearing and also, where identified substantially understate the potential.

The "on foot" surveys were conducted during the winter and summer seasons but no surveys were taken in the spring and autumn seasons therefore omitting two very significant seasons for the observation of seasonal flora, fauna and migratory avian species. This omission requires that "on-foot" surveys for the omitted seasons be undertaken and included in a revised issue or the report.

Yours faithfully,

Lea K. Wheatley

Ind 481-1





## **INDIVIDUAL LETTER 481: LEA WHEATLEY**

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### **Response to Comment Ind 481-1**

The commenter identifies concerns with flora, fauna, and migratory birds not identified in the DEIR, but does not specifically state which species. In addition, the commenter questions the timing of surveys. Please see Master Response 31 - Rare Plants and Master Response 37 - Birds and Raptors.



Individual Letter 482

*We oppose*

**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a ~~modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.~~

*is a potential disaster*

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. ~~This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.~~

*Not likely to happen for current residents.*

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to ~~jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.~~

*Vote against*

Name(s) Len + Debbie Schneider

Address 10864 Old Pond Lane ZIP 95949

Phone 530-268-3386

Email Address deb5ch108@gmail.com

Ind 482-1



## **INDIVIDUAL LETTER 482: LEN AND DEBBIE SCHNEIDER**

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### **Response to Comment Ind 482-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 483**

March 25, 2022

Matt Kelley, Senior Planner  
950 Maidu Ave. Suite 170  
Nevada City, CA 95959

Dear Matt,

**Ind 483-1**

We have been following the proposal to reopen the Idaho Maryland Mine on Brunswick Road in Grass Valley, including attending the public Supervisor's meeting on March 24<sup>th</sup>. When my husband and I moved to Nevada County, we were alarmed by all the disclosures that we were required to acknowledge before purchasing our home on Lee Lane. The area had obviously been riddled with toxic practices stemming from the mid 1800's forward. We felt grateful that the land, trees and water were in the process of being restored to a healthy environment. Then we learned of the proposed reopening of mines in the area that threaten to continue polluting this beautiful land for the same reason it was so devastatingly destroyed more than a century ago, and continuing to be allowed into the late 20<sup>th</sup> century.

**Ind 483-2**

Hearing the various issues that were addressed on March 24<sup>th</sup> in reference to the DIER we were alarmed that if the Rise Corporation were allowed to open the Idaho Maryland mine, that there would be blasting of underground tunnels, threatening the homeowners that rely on private wells by potentially striking water bearing fractures and dewatering or contaminating local wells, air quality issues of which we are struggling with already, sound pollution, and many more issues that could change our community for the unforeseeable future.

**Ind 483-3**

There have been many lessons learned about the devastating effects from mining that need to be remembered in order to protect our entire area. Simply walking in Empire Mine State Historic Park and seeing how many areas are still too toxic to be open to the public is a huge red flag as to how devastating this practice is, whether the operations are above ground or below.

**Ind 483-4**

Property values will be impacted tremendously if the pollution of truck traffic, the safety of our roads with the hauling of rock and mining debris, the noise of blasting, the inevitable public health issues of toxic metals being released into the aquifers are allowed, sacrificing the beauty of our natural environment for a proposed 80 years only for a few additional jobs and tax revenue. It's too great of a risk to take. Instead, we need to heal the devastating effects of the past mining operations, creating a healthy environment for those of us that have been born here or have migrated here for a better and healthier life.

Thank you for rejecting the proposed mine opening, promoting and sustaining the health of this beautiful land and its residents both now and in the future.

Sincerely,



Letitia and Robert Jacobs

13584 Lee Lane, Nevada City, CA  
95959



## **INDIVIDUAL LETTER 483: LETITIA AND ROBERT JACOBS**

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### **Response to Comment Ind 483-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 483-2**

The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 483-3**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 483-4**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





Individual Letter 484

Nevada County Planning Commission Date: 950 Maidu Avenue, Suite 170  
Nevada City, CA, 95959

1/29/20



Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

January 23, 2022

Ind 484-1

I have lived in Nevada County now for over 50 years. I raised my family here and retired from high school teaching in 2006 to run NCTV for 6 years. I helped broadcast your government meetings and have working with most of the non-profits in the community and served on many of their boards and well as working with County staff. In other words, I have seen many changes here and respect the work of many contributors. I have a long-standing interest in our community and oppose the approval of Rise Gold's proposed mine for the various reasons;

Ind 484-2

1. Follow the history of extractive industries both here and elsewhere. They leave a dismal legacy.

Ind 484-3

2. Nevada County has left its industry of mining and has moved on to recreation, tourism and now lumber/forest/water management.

Ind 484-4

3. The jobs that Rise Gold promises are not needed as we already have a shortage of workers and timber/forest management will provide a lifetime of opportunities for employment along with service and construction industries. For example, due to the recent storm, I have large, downed trees. The tree services here are backed up and say it will be 3 months before they can remove them.

Ind 484-5

4. The storm also left me without power for 12 days. PG&E will have its hands full providing both summer and winter support, providing jobs.

Ind 484-6

5. The power and water footprint of the proposed mine will make huge demands when our environment cannot absorb these impacts, as well as accompanying health issues due to air pollution.

Ind 484-7

6. Just the amount of trucking going through town will create a huge impact on air, noise and traffic congestion.

Ind 484-8

Finally, when we stand back and look at our county and its future, we need to ask ourselves the question, what are our priorities? Do we want to return to a heavy industrial base and give up the quality of life that brings people here both to live and recreate?

You can approve the proposal and anticipate years of litigation or disapprove the proposal and be done with it, so we can get on with our lives.

Thank you for your patience. I wish you wisdom in your decision.

Lew Sitzer, [lewsitzer@yahoo.com](mailto:lewsitzer@yahoo.com), 530-913-3210

10560 Whispering Oaks Lane, Nevada City, CA. 95959



## **INDIVIDUAL LETTER 484: LEW SITZER**

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### **Response to Comment Ind 484-1**

The comment is an introductory statement expressing opposition to the proposed project and does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 484-2**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 484-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

### **Response to Comment Ind 484-4**

The comment does not address the adequacy of the DEIR. Please see Master Response 2 – Social and Economic Impacts.

### **Response to Comment Ind 484-5**

The comment does not address the adequacy of the DEIR.

### **Response to Comment Ind 484-6**

The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 484-7**

Please see Master Response 1 – Non-EIR/Administrative Issues. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 484-8**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 485**

Dist 1 **RECEIVED**

Nevada County Board of Supervisors Date: 950 Maidu Avenue, Suite 200  
Nevada City, CA, 95959

FEB 01 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy  
Bullock,

January 23, 2022

**Ind 485-1**

I have lived in Nevada County now for over 50 years. I raised my family here and retired from high school teaching in 2006 to run NCTV for 6 years. I helped broadcast your meetings and have working with most of the non-profits in the community and served on many of their boards and well as working with County staff. In other words, I have seen many changes here and respect the work of many contributors. I have a long-standing interest in our community and oppose the approval of Rise Gold's proposed mine for the various reasons;

**Ind 485-2**

1. Follow the history of extractive industries both here and elsewhere. They leave a dismal legacy.

**Ind 485-3**

2. Nevada County has left its industry of mining and has moved on to recreation, tourism and now lumber/forest/water management.

**Ind 485-4**

3. The jobs that Rise Gold promises are not needed as we already have a shortage of workers and timber/forest management will provide a lifetime of opportunities for employment along with service and construction industries. For example, due to the recent storm, I have large, downed trees. The tree services here are backed up and say it will be 3 months before they can remove them.

**Ind 485-5**

4. The storm also left me without power for 12 days. PG&E will have its hands full providing both summer and winter support, providing jobs.

**Ind 485-6**

5. The power and water footprint of the proposed mine will make huge demands when our environment cannot absorb these impacts, as well as accompanying health issues due to air pollution.

**Ind 485-7**

6. Just the amount of trucking going through town will create a huge impact on air, noise and traffic congestion.

**Ind 485-8**

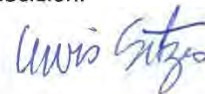
Finally, when we stand back and look at our county and its future, we need to ask ourselves the question, what are our priorities? Do we want to return to a heavy industrial base and give up the quality of life that brings people here both to live and recreate?

You can approve the proposal and anticipate years of litigation or disapprove the proposal and be done with it, so we can get on with our lives.

Thank you for your patience. I wish you wisdom in your decision.

Lew Sitzer, [lewsitzer@yahoo.com](mailto:lewsitzer@yahoo.com), 530-913-3210

10560 Whispering Oaks Lane, Nevada City, CA. 95959



## **INDIVIDUAL LETTER 485: LEW SITZER**

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### **Response to Comment Ind 485-1**

See Response to Comment Ind 484-1.

### **Response to Comment Ind 485-2**

See Response to Comment Ind 484-2.

### **Response to Comment Ind 485-3**

See Response to Comment Ind 484-3.

### **Response to Comment Ind 485-4**

See Response to Comment Ind 484-4.

### **Response to Comment Ind 485-5**

See Response to Comment Ind 484-5.

### **Response to Comment Ind 485-6**

See Response to Comment Ind 484-6.

### **Response to Comment Ind 485-7**

See Response to Comment Ind 484-7.

### **Response to Comment Ind 485-8**

See Response to Comment Ind 484-8.





**Individual Letter 486**

**Liese Greensfelder**  
18977 Wepa Way, Nevada City, CA 95959  
tel. (530) 292-4248  
liescg@nasw.org

April 4, 2022  
Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Ave., Suite 170  
Nevada City, CA 95959  
Idaho.MMEIR#co.nevada.ca.us

Re: adequacy of DEIR Idaho-Maryland Mine Project

Dear Matt Kelley,

After reviewing the **Hydrology** and Water Quality chapter of the DEIR for the Idaho-Maryland Mine Project, I'm astonished by the sparsity of data on which the DEIR bases its conclusions. Below I address just one of those.

The DEIR has used a groundwater hydrology model that assumes that the geology over the 2,585 acre project site is homogeneous.

I was one of the leaders of the cooperative effort from 1992 to 1997 between the San Juan Ridge Taxpayers Association (SJRTA) and Siskon Gold Corporation to craft a mining project that would have the least possible impact on surrounding communities. Over objections from our association, the EIR for that project based its hydrology analysis on the conclusion that:

“Numerous studies have been conducted on the surface and ground water hydrology at the project site, and the data are voluminous ... (that) Two separate groundwater systems occur under the project site.” And that “The bedrock is a *confined* groundwater system.” (my italics)

Thus, according to that EIR analysis, there was no connection between the project area and wells surrounding that area.

Yet 17 months after project commencement, tunnel excavations intercepted a large groundwater fracture that dewatered some 12 wells, some of them several miles from the tunnel itself.

**Ind 486-1**





Ind 486-2

↑ This example, from the *initial stages* of the project, that is, before the proposed 3-mile-tunnel was less than a mile long, provides an object lesson and warning that a geological model that assume homogeneity cannot adequately address the complex geology of 2,585 subsurface acres.

**Noise:** I've read the Salter Report Acoustical Review of the DEIR Noise and Vibration section of the DEIR, and am alarmed by its finding that the DEIR underestimates certain noise levels by 10 to 18 dB.

A 10 decibel increase is perceived as a doubling of sound, and a 20 decibel increase is perceived as a quadrupling. So the Salter Report is extremely concerning. And these discrepancies must be addressed.

The neighborhood in the vicinity of the Idaho-Maryland project area is blessed with low ambient noise levels, especially nighttime noise levels, as was the area surrounding the Siskon Mine.

Our experience with the Siskon Mine was that nighttime operations just within the mouth of the tunnel and outside the mouth were far higher than the EIR had predicted. And although they only occasionally exceeded county nighttime standards, residents of households situated on a hillside as far as two miles from the tunnel mouth reported project noise from equipment, generators and fans that greatly increased their normal nighttime noise environmental, with a concomitant decrease in their quality of life.

I'd like to conclude by saying that I've read CEA's report on the DEIR, and am in agreement with all of the areas of inadequacy that the report details.

Thank you for your attention to my concerns.

Sincerely,  
Liese Greensfelder



## **INDIVIDUAL LETTER 486: LIESE GREENSFELDER**

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### **Response to Comment Ind 486-1**

Please see Master Response 14 – Adequacy of Groundwater Model.

### **Response to Comment Ind 486-2**

Please see Response to Comment Grp 7-39 and 7-40.



**Individual Letter 487**

March 31, 2022

16910 Cooper Road  
Nevada City, California 95959

Matt Kelley  
Nevada City Planning Department  
950 Maidu Avenue Suite 170  
Nevada City, California 95959

Dear Mr. Kelley:

I oppose the application for the opening of a gold mine proposed by the Idaho-Marilyn Mine Project. Many objections have been submitted by citizens of this county that pointed out the flaws in the environmental impact report prepared by the Rise Gold applicants. I agree that the impact report is highly distorted.

I strongly oppose any proposal which would impact water supply and quality, noise and air quality.

Sincerely,



Lilly Grenz

**Ind 487-1**



## **INDIVIDUAL LETTER 487: LILLY GRENZ**

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### **Response to Comment Ind 487-1**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.



**Individual Letter 488**

**From:** Lily Marie <lilymarie@infostations.com>  
**Sent:** Tuesday, March 29, 2022 8:31 AM  
**To:** Idaho MMEIR  
**Subject:** Idaho Marilyn Mine EIR Comments

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3-29-2022

**To: Matt Kelley, Nevada County Planning Dept.**

Nevada County Planning Commission

Nevada County Board of Supervisors

950 Maidu Ave.

Nevada City, CA 95959

**From: Lily Marie Mora**

11683 Alta Vista Ave.

Grass Valley, CA 95945

**Re: Rise Grass Valley, Inc.—EIR –I am opposed to the mine for many good reasons.**

**Dear County Staff, Planning Commission Members and Supervisorial Board Members:**

I have been working to review the EIR findings and have come to the conclusion that Rise Grass Valley, Inc.'s time to be in business in Nevada County has come and gone. The regulatory (government) intervention that will be needed to make this company operate within environmental, health and safety standards in this populated area will be astronomical.

Ind 488-1





Who will pay for all these watch dogs to make sure this company operates legally, as it already has a terrible track-record of bankruptcy, unfinished environmental clean-up in Canada and unpaid employees from its last mining fiasco?

I have lived in Nevada County all my life, 66years. I have had family members involved in all aspects of mining, up until the Siskon Mine, another Canadian company, that opened on the North San Juan ridge in the early 1990's. It all sounded great in the beginning, but soon became a huge environment catastrophe. A lot of the private property wells went dry and/or became contaminated, and the school still buys bottled water. Our county government sold out our kids, and their future for the promise of big money and a few jobs.

**The areas of the EIR that I am the most concerned about are the Size of the Mine, Clean Drinking Water availability, Maintaining Healthy Air Quality Standards, the Mitigation Measures and the possible bias of an EIR that was paid for by Rise Grass Valley, Inc.**

I will list some of my many concerns:

**1.) The location and size of the site and underground footprint of the mineral rights—**

**(Aprox. 2,585 acres)**

- Most people in the county have been getting their information about this project through articles in the Union newspaper.

It has only been from reading this EIR that I understood the true size, scope and area of the mineral rights footprint, which poses a great risk to many landowners, businesses and our local Airport (*now used for year around fire suppression*).

It seems that a more direct comprehensive notification plan to educate these stakeholders would be necessary to evaluate the real support for and viability of this project.

Rise Grass Valley, Inc.'s flashy mailers don't come close to explaining the possible risks involved with the proposed mining operation. The flyers appear to be more divisive than informative.

Will there be an Emergency Fund put up by Rise Grass Valley, Inc., and held by the County of Nevada to handle any and all of the possible problems that will come up in the next 80yrs.?

**2.) Water Issues and Mitigation Measures:**

- The Sysckon mine project let us all know that the wells in the area are at risk,

Ind 488-2

Ind 488-3



- Pg. 4.3-49, 2<sup>nd</sup> Paragraph of the EIR, I learned about Surface Fugitive Dust Control.

"The modeling assumes that, during construction, NID-supplied water would be required for dust suppression. The NID-supplied water would result in associated indirect GHG emissions. For the assessment, it was assumed that about 11 million gallons total would be required for construction dust suppression."

It seems that the people compiling this EIR are not educated about water use rules and regulations that are put in place during drought conditions.

On Feb. 9, 2022 and on April 28, 2021--NID-Nevada Irrigation District Board of Directors passed resolutions to implement Stage 1 of the Water Storage Contingency Plan.

Visit: [www.nid.com/water-shortage-stages](http://www.nid.com/water-shortage-stages) See: Table Stage 1-- 10%Supply Shortages for summary.

1. Treated Water and Municipal Customers are 1st on that list
2. Agriculture Customers are 2<sup>nd</sup>

(Being part of a ranching family, we have already been dealing directly with these restrictions during the drought.)

3. District Actions- is 3<sup>rd</sup> on the list

- Declare no new or increased surplus availability.

The State of CA Water Resources Board and NID have obviously realized the need to prioritize water usage to have enough clean water to drink and to grow healthy food to eat; dust control has not even been mentioned on the list.

This 11million gallons of NID water will be greatly needed for fire suppression, which has become a year around job during the drought.

This is a great error in the calculation of mitigation measures in this EIR.

### **3.) Air Quality, Greenhouse Gas Emissions and Energy Issues and Mitigation Measures:**

- See various Tables:

Construction Off Road Equipment and On Road On Site Vehicle Trip Assumptions.

Diesel is the fuel mentioned to be used the most in all phases of the development process. Equipment will be running 1hr. to 24hrs per day depending on the equipment needed for the task. Even when electricity is mentioned as the fuel type, it does not mention how the electricity will be generated. Much of our electricity comes from hydroelectric power plants, which require a lot of rain and snow. What happens during a drought? If the public is in competition for the same electrical supply, won't our utility bills increase?

Ind 488-4

Ind 488-5



**Ind 488-6**

Also, I didn't find how the Mitigation Measures would address the air quality during "Year Around Fire Season." You don't need to be an environmental scientist to know that the Air Quality meets fair to very unhealthy standards during these times.

**Ind 488-7**

I didn't see addressed how Rise Grass Valley, Inc would handle their 24 hr./7day a week operations during a PG& E "black out" due to hazardous fire conditions. It would seem that they would need to use their back-up generators to supply the needed electricity, which are diesel powered, adding even more pollution to our unhealthy air.

**Ind 488-8**

The air quality testing in this area seemed extremely lacking, as one of the test sites used was in Yuba City, CA located many miles away from the mine site.

So, that makes the mitigation measures at best misleading and the amount of mitigation measures needed to manage everything from the "Health Risks of Mining to the Reduction of Emissions" are daunting.

**Ind 488-9**

**4.) Wildfire Issues and Mitigation Measures –**

- Figure 4.13-1, both the Centennial and Brunswick Industrial Sites are located on lands classified as being within a "Very High Fire Hazard Severity Zone."

**Ind 488-10**

- The EIR section on Prevailing Winds and Fire History are indicating that the southwesterly wind patterns can cause fire to burn through the mine site. In August 2021, the Bennett Fire did burn 59 acres of the Centennial Industrial site.

**Ind 488-11**

- Earlier in the EIR, it was mentioned that there would be 2-12,000 gallon diesel fuel tanks locate at the mine site. What safety measures will be taken to keep these tanks from burning or exploding in a fire and/or leaking, if they are installed underground?

**Ind 488-12**

- Public Safety Shutoffs—Will the mine shut down during these emergencies or will their power use take precedence over other users?

**Ind 488-13**

- How will evacuation routes, like Bennett St. and Idaho Marilyn Rd. be use during a forest fire, if they are clogged with mine truck traffic?

**Ind 488-14**

These concerns highlight the difficulties of having a mining operation in a developed community.  
  
When peoples' lives are on the line that is "significant" and that cannot be mitigated to "less significant."

**Ind 488-15**

There are a couple of old sayings that come to mind, "The man who does not learn the lessons of history is doomed to repeat them" and "All that glitters is not gold" is another.



So, as we all move forward to assess the real risks and benefits of this project, let us move into the mindset of "Ourstory." Will we court businesses that are fraught with problems from the beginning or will we choose businesses that benefit our entire community and our future generations.

In conclusion, I found the Mitigation Measures to be simplistic and short sighted. I know you need to look at the merits of this project as described in the EIR, but as you deliberate to voter to approve or deny this project, think what if it was located near your home / well or local business? Put yourself and your family in the shoes of the individuals and families that will be directly affected by this mine. You represent all of us and our families, not big corporate interests from another country.

Many thanks to all of you for your time, consideration and hard work to evaluate this most complicated issue.

Sincerely,

Lily Marie Mora





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## **INDIVIDUAL LETTER 488: LILY MARIE**

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### **Response to Comment Ind 488-1**

This comment is introductory in nature. The commenter opposes the project and references the Project Applicant's reputation. The commenter's opposition to the project is noted for the decisionmakers. The commenter is also referred to Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 488-2**

The commenter is concerned about a number of resource areas impacted by the mine, but is primarily concerned with the scope of the mineral rights boundary and implies that the Project Applicant will conduct underground mining to the extent of that boundary. The commenter is referred to Master Response 7 - Location of Future Mining Areas. Regarding the various resource areas mentioned by the commenter, the DEIR provides analysis of the project's impacts and proposes numerous mitigation measures. The commenter is referred to Chapter 4 of the DEIR. Regarding the media associated with the project, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 488-3**

The commenter states that project's water consumption for dust suppression would violate NID drought plans for water shortages. The commenter does not specifically identify what NID rules and regulations the project would violate or how the DEIR is inadequate. The DEIR found that impacts to water supply during normal, dry, and multiple dry years would be less than significant. (DEIR, 4.11-35.) The commenter is also referred to the project's Water Supply Assessment, Appendix N of the DEIR.

### **Response to Comment Ind 488-4**

The commenter reiterates concerns regarding the project's water consumption. The commenter is referred to Appendix N of the DEIR, and Master Response 16 - Drought and Climate Change.

### **Response to Comment Ind 488-5**

The commenter states that the project's energy consumption is inappropriate in light of the drought and it would raise the utility bills of others in the community. As stated on page 4.11-35 of the DEIR, PG&E provided a will serve letter for the project, PG&E has confirmed that there are electric facilities available to serve the proposed project in accordance with all applicable design standards, rules, and tariffs on file with the State of California Public Utilities Commission. Regarding utility bills, the commenter is referred to Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 488-6**

The commenter states that the DEIR does not account for air quality impacts due to wildfire but does not state how the DEIR is inadequate. The commenter is referred to Master Response 18 - Air Quality Thresholds.

### **Response to Comment Ind 488-7**

The commenter states that the DEIR fails to discuss how the project would operate during a power outage. As stated on page 58 of Appendix E.1, the Stationary Engine ATCM allows owners and operators of emergency standby engines to use those engines to provide electrical power when a facility experiences the loss of normal electrical service that is beyond the reasonable control of the facility. Electrical service loss resulting from Public Safety Power Shutoff events is beyond the reasonable control of back-up engine owners and operators, and therefore, appropriately-





permitted emergency standby engines may be operated to provide electrical power during such an event pursuant to the Stationary Engine ATCM.

Air emissions from use of emergency generators are provided on pages 3.3-103 to 4.3-104 of the DEIR. Although maximum daily emissions have been estimated, the ultimate number of days per year the generators would operate cannot be known with certainty. Because the use of emergency generators is speculative and beyond the reasonable control of Rise Grass Valley, Inc., the emissions presented in the DEIR are for informational purposes only. Finally, it is important to note that while the use of emergency generators during power-outages such as PSPSs is outside of the scope of CEQA, the regular use of generators for routine maintenance and testing has been considered throughout the entirety of the analysis of the chapter, as such use is not speculative.

#### **Response to Comment Ind 488-8**

The commenter questions the selection of ambient air quality monitoring stations summarized in the “Local Air Quality Monitoring” section of the DEIR, Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). The ambient criteria air pollutant data are presented for context and are used to determine the NSAQMD’s compliance with the AAQS and to set applicable thresholds of significance. Therefore, they are not directly relevant to the analysis of the impacts from the project to criteria air pollutants. Significance determinations in the DEIR are based on comparison to the NSAQMD thresholds, which were developed based on compliance with AAQS. Further, the NSAQMD reviewed all versions of the Air Quality and Greenhouse Gas Technical Report (included as Appendix E.1 in the DEIR) and did not identify issues regarding the ambient air monitoring stations selected.

#### **Response to Comment Ind 488-9**

The commenter references Figure 4.13-1, which identifies the project sites as being located in Very High Fire Hazard Severity Zones. The comment is noted.

#### **Response to Comment Ind 488-10**

The commenter references the “Prevailing Winds” paragraph on DEIR page 4.13-3. The commenter is noted.

#### **Response to Comment Ind 488-11**

The commenter asks what safety measures will be taken for the fuel tanks installed at the Brunswick site and whether they will be stored underground. Fuel tanks are not proposed to be installed underground. As stated on page 4.13-24 of the DEIR, the project would install two, 12,000-gallon above-ground diesel fuel storage tanks on the Brunswick Industrial Site. The tanks would be located in the industrial building complex area, away from existing and proposed vegetation. Diesel fuel is considered a Class II liquid, and as such, the tanks would be regulated in accordance with Chapter 23 of the California Fire Code (CFC). Chapter 23 of the CFC includes robust design requirements for above-ground fuel storage tanks to minimize fire hazard to the maximum extent feasible, including but not limited to requirements for overfill protection, spill containment, and dispenser emergency shutoff valve. Compliance with CFC requirements, as determined by the Fire Marshall’s Office, at time of improvement plan review, would reduce fire hazards related to on-site fuel storage tanks.

#### **Response to Comment Ind 488-12**

The commenter asks if the project would consume electricity during a Public Safety Power Shutoff when electricity is turned off. The Project Applicant does not control Public Safety Power Shutoffs. In such an event the project may use its onsite backup power generators.



**Response to Comment Ind 488-13**

The commenter asks how the project would impact an evacuation during an emergency. The commenter is referred to Master Response 5 - Evacuation Zones.

**Response to Comment Ind 488-14**

This comment does pertain to the adequacy of the DEIR. Responses to specific comments are provided above.

**Response to Comment Ind 488-15**

The commenter opposes the project. Responses to specific comments are provided above. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.



**Individual Letter 489**

**From:** [Linda Boswell](#)  
**To:** [hbdfs@supervisors](#)  
**Subject:** Fw: Rise Gold , Company That Wants to Re-open Idaho Maryland Mine  
**Date:** Friday, February 25, 2022 3:07:11 PM

Dist 1

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Dear Supervisors,

Do you all really think this is a good idea for our community??

What's in it for you personally?

Do any of you live in the impacted area? Bet you don't.

Please seriously give this fiasco some thought, and choose wisely for us all..

Blessings,

Linda

**Subject:** Rise Gold , Company That Wants to Re-open Idaho Maryland Mine

<https://www.minewatchnc.org/post/rise-gold-shouldn-t-be-trusted-here-s-why?fbclid=IwAR1JleDTz1vPDuJp2pLv646K1hmeixXr2Le7fC6zsbp-eLY94U9lDaL0MuE>

**Ind 489-1**



## **INDIVIDUAL LETTER 489: LINDA BOSWELL**

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### **Response to Comment Ind 489-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 490**

**From:** [Linda Carlson](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** Letter Re The Idaho-Maryland Mine reopening  
**Date:** Saturday, April 2, 2022 11:06:26 AM

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Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Dept.  
950 Maidu Ave, Suite 170  
Nevada City, CA 95959

**Ind 490-1**

Dear Mr Kelley,  
I am writing you to protest the reopening of the Idaho-Maryland Mine.  
My name is Linda Carlson and I moved up to Grass Valley from Sunnyvale after I retired 5 years ago. I had lived in the Bay Area for over 50 years. However during that time the area became more crowded and that caused more pollution. So I moved up here and I live in an apartment a mile way from the mine.

**Ind 490-2**

I am concerned about air and water pollution along with traffic congestion in our area.  
And I don't believe the hype. I don't believe the miners are going to be paid \$95,000 a year and that the company would protect their workers or stop pollution the mining would create.  
It's my understanding that Rise Gold Corp is headquartered in Canada. That's along way from Grass Valley and their people would not be living here and would not experience any adverse reaction resulting from working the mine.

**Ind 490-3**

Plus CEO Ben Mossman lost his last company through bankruptcy and I understand he is still facing criminal charges.  
Also, why are there not any California companies interested in reopening the mine?  
I know you are very busy and I trust you will have the safety of the people currently living here foremost in your mind.

Sincerely,  
Linda Carlson  
530/205-0018

Sent from my iPad





## **INDIVIDUAL LETTER 490: LINDA CARLSON**

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### **Response to Comment Ind 490-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 490-2**

The commenter expresses general concerns regarding air, water pollution, and traffic associated with the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 490-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 491**

**From:** [Linda](#)  
**To:** [hcbosupervisors](#)  
**Subject:** Vote against Rise Gold mine  
**Date:** Tuesday, March 22, 2022 11:14:22 AM

Dist 1

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**Ind 491-1**

Dear Supervisors,  
Please do not allow this operation to come in to our Western Nevada County cherished sphere of residence, community and Commerce.

Please explore many other ways to approach suitable jobs and so forth for us.

I believe this operation will not enhance our community but will rather degrade it. Mitigations often fall apart down the road after there bowed after their promised.

I am a resident and property owner in Nevada City for 20 years. And a California resident for much more.

Thank you,  
Linda Cohen  
14520 Alderwood Way  
Nevada City, Ca



## **INDIVIDUAL LETTER 491: LINDA COHEN**

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### **Response to Comment Ind 491-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 492**

**From:** [Linda Ennis](#)  
**To:** [Idaho MMEFB](#)  
**Date:** Wednesday, February 16, 2022 5:20:00 PM

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**Ind 492-1**

We are against New Rise coming into our county. They blew it in Canada, who's to say they won't make the same mistakes here. Not to mention the added traffic, damaged roads from all the heavy loads, the NOISE, property values declining, WATER POLLUTION, peace and quiet for that residential neighborhood, need I go on. And when they go bankrupt and skip town, which they will, we will be stuck cleaning up their mess. This man is a fraud, send him back to where he came from, we don't need that kind of business any longer. PLEASE VOTE NO. Thank you, Linda Ennis



## **INDIVIDUAL LETTER 492: LINDA ENNIS**

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### **Response to Comment Ind 492-1**

Please see Master Responses 1 through 3. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.





**Individual Letter 493**

**From:** Linda Fillion <lindafillion843@gmail.com>  
**Sent:** Thursday, March 31, 2022 11:39 AM  
**To:** Idaho MMEIR  
**Subject:** Draft Environmental Impact Report

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To Whom It May Concern:

Please read and take seriously the comments by the CEA Foundation (Community Environmental Advocates Foundation) as regards the Draft Environmental Impact Report for the proposed reopening of the Idaho-Maryland Mine.

<https://yubanet.com/regional/cea-foundation-significant-flaws-in-the-deir-for-the-proposed-reopening-of-idaho-maryland-mine/>

Ind 493-1

Like most others in Western Nevada County I am against the mine's reopening because of the extensive damage it will do to the town of Grass Valley and hence to Nevada County. The damage costs will far exceed any profits realized by the mine.

Thank you for your consideration.

Linda Fillion  
757 Uren Street  
Nevada City,  
CA 95959



## **INDIVIDUAL LETTER 493: LINDA FILLION**

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### **Response to Comment Ind 493-1**

The comment cites concurrence with CEA Foundation's comments on the adequacy of the DEIR. CEA Foundation's comment letters are addressed in responses to Group Letter 6, 7, and 8. Please also see Master Responses 1 and 2.



**Individual Letter 494**

**From:** Sunny Lyons <sunnylyons@yahoo.com>  
**Sent:** Saturday, March 19, 2022 12:29 PM  
**To:** Idaho MMEIR  
**Subject:** RISE Mine

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To Whom it May Concern:

- Ind 494-1** I am writing to express my extreme concerns about the Rise gold project reopening of the mine. Not only do they have a very poor track record, but they are also being disingenuous about the impact reopening the mine would thrust upon our community.
- Ind 494-2** Please vote NO on the mine to protect our already frail and essential water supply. Your NO vote will also protect the community from other mining pollution, noise and traffic.
- Ind 494-3** Please vote in favor of supporting our community, not a greedy and sketchy company coming in to reap profits at our expense.

Thank you,  
Linda Howe



## **INDIVIDUAL LETTER 494: LINDA HOWE**

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### **Response to Comment Ind 494-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 494-2**

Please see Master Responses 13 through 15 regarding groundwater. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 494-3**

Please see Master Responses 1 and 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 495**

March 21, 2022

Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 95959-8617



Re: Preliminary Environmental Impact Report  
Rise Gold Idaho Maryland Mine reopening study  
Grass Valley, California

Dear Mr. Kelley:

**Ind 495-1**

In the following, we set forth our concerns for sufficient study that will result in identified mitigation measures that can be incorporated in an approval of the reopening of the Idaho Maryland Mine proposal:

As proposed for operation, there will be significant detrimental impact on nearby and surrounding properties as a direct result of projected increased traffic impacts (truck traffic), audible noise from operations and trucks, degradation of air quality, potential loss of water wells from proposed mine dewatering, hazardous waste disposal and remediation, just to identify just a few.

**Ind 495-2**

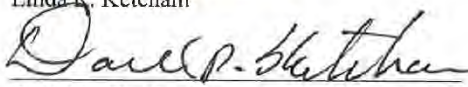
Under California real estate disclosure statutes, a Seller is required to disclose all known detrimental property conditions to a Buyer.<sup>1</sup> Unquestionably, the above cited potential impacts on nearby properties will require disclosure and will most certainly result in diminution or loss in property value.<sup>2</sup>

**Ind 495-3**

We would ask that the proposed environmental impact report study sufficiently study and quantify the economic impact on real estate values within the geographic region that can be reasonably projected to be impacted by the proposed reopening of the Idaho Maryland Mine.

Respectfully submitted,

  
Linda R. Ketcham

  
Daniel R. Ketcham  
11693 Brunswick Pines Road  
Grass Valley, CA 95945

Cc. Community Environmental Advocates

1. See California Association of Realtors 1) Real Estate Transfer Disclosure Statement (TDS 12/21) as required by CA Civil Code §1102 et seq; see paragraph C line 11; 2) Seller Property Questionnaire (SPQ 12/21); see paragraph 6. line D& E and paragraph 16, line A; 3) Seller Vacant Land Questionnaire; see paragraph 11 A, and 15 E & D.
2. Source: Randall Bell, MAI, "Real Estate Damages - Applied Economic and Detrimental Conditions", *Appraisal Institute*, 2008, 2nd Edition.







**REAL ESTATE TRANSFER DISCLOSURE STATEMENT**  
(CALIFORNIA CIVIL CODE § 1102, ET SEQ.)  
(C.A.R. Form TDS, Revised 12/21)

THIS DISCLOSURE STATEMENT CONCERNS THE REAL PROPERTY SITUATED IN THE CITY OF \_\_\_\_\_  
County \_\_\_\_\_, COUNTY OF \_\_\_\_\_, STATE OF CALIFORNIA,  
DESCRIBED AS \_\_\_\_\_, CA

THIS STATEMENT IS A DISCLOSURE OF THE CONDITION OF THE ABOVE DESCRIBED PROPERTY IN COMPLIANCE WITH SECTION 1102 OF THE CIVIL CODE AS OF (date) \_\_\_\_\_. IT IS NOT A WARRANTY OF ANY KIND BY THE SELLER(S) OR ANY AGENT(S) REPRESENTING ANY PRINCIPAL(S) IN THIS TRANSACTION, AND IS NOT A SUBSTITUTE FOR ANY INSPECTIONS OR WARRANTIES THE PRINCIPAL(S) MAY WISH TO OBTAIN.

**I. COORDINATION WITH OTHER DISCLOSURE FORMS**

This Real Estate Transfer Disclosure Statement is made pursuant to Section 1102 of the Civil Code. Other statutes require disclosures, depending upon the details of the particular real estate transaction (for example: special study zone and purchase-money liens on residential property).

**Substituted Disclosures:** The following disclosures and other disclosures required by law, including the Natural Hazard Disclosure Report/Statement that may include airport annoyances, earthquake, fire, flood, or special assessment information, have or will be made in connection with this real estate transfer, and are intended to satisfy the disclosure obligations on this form, where the subject matter is the same:

- Inspection reports completed pursuant to the contract of sale or receipt for deposit.
- Additional inspection reports or disclosures: \_\_\_\_\_
- No substituted disclosures for this transfer.

**II. SELLER'S INFORMATION**

The Seller discloses the following information with the knowledge that even though this is not a warranty, prospective Buyers may rely on this information in deciding whether and on what terms to purchase the subject property. Seller hereby authorizes any agent(s) representing any principal(s) in this transaction to provide a copy of this statement to any person or entity in connection with any actual or anticipated sale of the property.

THE FOLLOWING ARE REPRESENTATIONS MADE BY THE SELLER(S) AND ARE NOT THE REPRESENTATIONS OF THE AGENT(S), IF ANY. THIS INFORMATION IS A DISCLOSURE AND IS NOT INTENDED TO BE PART OF ANY CONTRACT BETWEEN THE BUYER AND SELLER.

Seller  is  is not occupying the property.

**A. The subject property has the items checked below: \***

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Range                     | <input type="checkbox"/> Wall/Window Air Conditioning                   | <input type="checkbox"/> Pool:  |
| <input type="checkbox"/> Oven                      | <input type="checkbox"/> Sprinklers                                     | <input type="checkbox"/> Child Resistant Barrier  |
| <input type="checkbox"/> Microwave                 | <input type="checkbox"/> Public Sewer System                            | <input type="checkbox"/> Pool/Spa Heater:   |
| <input type="checkbox"/> Dishwasher                | <input type="checkbox"/> Septic Tank                                    | <input type="checkbox"/> Gas <input type="checkbox"/> Solar <input type="checkbox"/> Electric |
| <input type="checkbox"/> Trash Compactor           | <input type="checkbox"/> Sump Pump                                      | <input type="checkbox"/> Water Heater:  |
| <input type="checkbox"/> Garbage Disposal          | <input type="checkbox"/> Water Softener                                 | <input type="checkbox"/> Gas <input type="checkbox"/> Solar <input type="checkbox"/> Electric |
| <input type="checkbox"/> Washer/Dryer Hookups      | <input type="checkbox"/> Patio/Decking                                  | <input checked="" type="checkbox"/> Water Supply:   |
| <input type="checkbox"/> Rain Gutters              | <input type="checkbox"/> Built-in Barbecue                              | <input type="checkbox"/> City <input checked="" type="checkbox"/> Well                        |
| <input type="checkbox"/> Burglar Alarms            | <input type="checkbox"/> Gazebo   | <input type="checkbox"/> Private Utility or   |
| <input type="checkbox"/> Carbon Monoxide Device(s) | <input type="checkbox"/> Security Gate(s)                               | Other _____   |
| <input type="checkbox"/> Smoke Detector(s)         | <input type="checkbox"/> Garage:  | <input type="checkbox"/> Gas Supply:  |
| <input type="checkbox"/> Fire Alarm                | <input type="checkbox"/> Attached <input type="checkbox"/> Not Attached | <input type="checkbox"/> Utility <input type="checkbox"/> Bottled (Tank)                      |
| <input type="checkbox"/> TV Antenna                | <input type="checkbox"/> Carport  | <input type="checkbox"/> Window Screens   |
| <input type="checkbox"/> Satellite Dish            | <input type="checkbox"/> Automatic Garage Door Opener(s)                | <input type="checkbox"/> Window Security Bars   |
| <input type="checkbox"/> Intercom                  | <input type="checkbox"/> Number Remote Controls _____                   | <input type="checkbox"/> Quick Release Mechanism on   |
| <input type="checkbox"/> Central Heating           | <input type="checkbox"/> Sauna  | Bedroom Windows   |
| <input type="checkbox"/> Central Air Conditioning  | <input type="checkbox"/> Hot Tub/Spa:                                   | <input type="checkbox"/> Water-Conserving Plumbing Fixtures                                   |
| <input type="checkbox"/> Evaporator Cooler(s)      | <input type="checkbox"/> Locking Safety Cover                           |   |
| Exhaust Fan(s) in _____                            | 220 Volt Wiring in _____  | Fireplace(s) in _____   |
| <input type="checkbox"/> Gas Starter _____         | <input type="checkbox"/> Roof(s): Type: _____                           | Age: _____ (approx.)  |
| <input type="checkbox"/> Other: _____              |   |   |

Are there, to the best of your (Seller's) knowledge, any of the above that are not in operating condition?  Yes  No. If yes, then describe. (Attach additional sheets if necessary): \_\_\_\_\_

(\*see note on page 2)

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TDS REVISED 12/21 (PAGE 1 OF 3)

Buyer's Initials \_\_\_\_\_ / \_\_\_\_\_

Seller's Initials \_\_\_\_\_ / \_\_\_\_\_



**REAL ESTATE TRANSFER DISCLOSURE STATEMENT (TDS PAGE 1 OF 3)**

KETCHAM & ASSOC., DANIEL R., 11693 Brunswick Plaza Road Grass Valley CA 95945 Phone: 5304279056 Fax: \_\_\_\_\_ 15 Quail Hill  
Daniel Ketcham Produced with Lona Wolf Transactions (zipForm Edition) 717 N Harwood St, Suite 2200, Dallas, TX 75201 www.lwolf.com



Property Address: \_\_\_\_\_ County, CA Date: \_\_\_\_\_

- B.** Are you (Seller) aware of any significant defects/malfunctions in any of the following?  Yes  No. If yes, check appropriate space(s) below.
- Interior Walls  Ceilings  Floors  Exterior Walls  Insulation  Roof(s)  Windows  Doors  Foundation  Slab(s)  
 Driveways  Sidewalks  Walls/Fences  Electrical Systems  Plumbing/Sewers/Septics  Other Structural Components

(Describe: \_\_\_\_\_)  
 If any of the above is checked, explain. (Attach additional sheets if necessary.): \_\_\_\_\_

\*Installation of a listed appliance, device, or amenity is not a precondition of sale or transfer of the dwelling. The carbon monoxide device, garage door opener, or child-resistant pool barrier may not be in compliance with the safety standards relating to, respectively, carbon monoxide device standards of Chapter 8 (commencing with Section 13260) of Part 2 of Division 12 of, automatic reversing device standards of Chapter 12.5 (commencing with Section 19890) of Part 3 of Division 13 of, or the pool safety standards of Article 2.5 (commencing with Section 115920) of Chapter 5 of Part 10 of Division 104 of, the Health and Safety Code. Window security bars may not have quick-release mechanisms in compliance with the 1995 edition of the California Building Standards Code. Section 1101.4 of the Civil Code requires all single-family residences built on or before January 1, 1994, to be equipped with water-conserving plumbing fixtures after January 1, 2017. Additionally, on and after January 1, 2014, a single-family residence built on or before January 1, 1994, that is altered or improved is required to be equipped with water-conserving plumbing fixtures as a condition of final approval. Fixtures in this dwelling may not comply with section 1101.4 of the Civil Code.

- C.** Are you (Seller) aware of any of the following:
1. Substances, materials, or products which may be an environmental hazard such as, but not limited to, asbestos, formaldehyde, radon gas, lead-based paint, mold, fuel or chemical storage tanks, and contaminated soil or water on the subject property . . . . .  Yes  No
  2. Features of the property shared in common with adjoining landowners, such as walls, fences, and driveways, whose use or responsibility for maintenance may have an effect on the subject property . . . . .  Yes  No
  3. Any encroachments, easements or similar matters that may affect your interest in the subject property . . . . .  Yes  No
  4. Room additions, structural modifications, or other alterations or repairs made without necessary permits. . . . .  Yes  No
  5. Room additions, structural modifications, or other alterations or repairs not in compliance with building codes . . . . .  Yes  No
  6. Fill (compacted or otherwise) on the property or any portion thereof . . . . .  Yes  No
  7. Any settling from any cause, or slippage, sliding, or other soil problems . . . . .  Yes  No
  8. Flooding, drainage or grading problems . . . . .  Yes  No
  9. Major damage to the property or any of the structures from fire, earthquake, floods, or landslides . . . . .  Yes  No
  10. Any zoning violations, nonconforming uses, violations of "setback" requirements . . . . .  Yes  No
  11. Neighborhood noise problems or other nuisances . . . . .  Yes  No
  12. CC&R's or other deed restrictions or obligations . . . . .  Yes  No
  13. Homeowners' Association which has any authority over the subject property . . . . .  Yes  No
  14. Any "common area" (facilities such as pools, tennis courts, walkways, or other areas co-owned in undivided interest with others) . . . . .  Yes  No
  15. Any notices of abatement or citations against the property . . . . .  Yes  No
  16. Any lawsuits by or against the Seller threatening to or affecting this real property, claims for damages by the Seller pursuant to Section 910 or 914 threatening to or affecting this real property, claims for breach of warranty pursuant to Section 900 threatening to or affecting this real property, or claims for breach of an enhanced protection agreement pursuant to Section 903 threatening to or affecting this real property, including any lawsuits or claims for damages pursuant to Section 910 or 914 alleging a defect or deficiency in this real property or "common areas" (facilities such as pools, tennis courts, walkways, or other areas co-owned in undivided interest with others) . . . . .  Yes  No

If the answer to any of these is yes, explain. (Attach additional sheets if necessary.): *Proposed existing mining operation creates truck traffic noise, negatively affects air quality, creates audible noise, creates ground vibrations, risk of explosive materials, etc. possible loss of well water supply*

- D.**
1. The Seller certifies that the property, as of the close of escrow, will be in compliance with Section 13113.8 of the Health and Safety Code by having operable smoke detector(s) which are approved, listed, and installed in accordance with the State Fire Marshal's regulations and applicable local standards.
  2. The Seller certifies that the property, as of the close of escrow, will be in compliance with Section 19211 of the Health and Safety Code by having the water heater tank(s) braced, anchored, or strapped in place in accordance with applicable law.

TDS REVISED 12/21 (PAGE 2 OF 3) Buyer's Initials \_\_\_\_\_ / \_\_\_\_\_ Seller's Initials \_\_\_\_\_ / \_\_\_\_\_









**SELLER PROPERTY QUESTIONNAIRE**  
(C.A.R. Form SPQ, Revised 12/21)

This form is not a substitute for the Real Estate Transfer Disclosure Statement (TDS). It is used by the Seller to provide additional information when a TDS is completed. If Seller is exempt from completing a TDS, Seller should complete an Exempt Seller Disclosure (C.A.R. Form ESD) or may use this form instead:

**NOTE TO SELLER:** YOU ARE STRONGLY ADVISED TO CAREFULLY REVIEW THE DISCLOSURE INFORMATION ADVISORY (C.A.R. Form DIA) BEFORE YOU COMPLETE THIS SELLER PROPERTY QUESTIONNAIRE. ALL SELLERS OF CALIFORNIA REAL PROPERTY ARE REQUIRED TO PROVIDE VARIOUS DISCLOSURES, EITHER BY CONTRACT, OR BY STATUTE OR CASE LAW. MANY DISCLOSURES MUST BE MADE WITHIN CERTAIN TIME LIMITS. TIMELY AND THOROUGH DISCLOSURES HELP TO REDUCE DISPUTES AND FACILITATE A SMOOTH SALES TRANSACTION.

Seller makes the following disclosures with regard to the real property or manufactured home described as                      situated in                                           County of                      California ("Property").

1. **Disclosure Limitation:** The following are representations made by the Seller and are not the representations of the Agent(s), if any. This disclosure statement is not a warranty of any kind by the Seller or any agents(s) and is not a substitute for any inspections or warranties the principal(s) may wish to obtain. This disclosure is not intended to be part of the contract between Buyer and Seller. Unless otherwise specified in writing, Broker and any real estate licensee or other person working with or through Broker has not verified information provided by Seller. A real estate broker is qualified to advise on real estate transactions. If Seller or Buyer desires legal advice, they should consult an attorney.

2. **Note to Seller, PURPOSE:** To tell the Buyer about known material or significant items affecting the value or desirability of the Property and help to eliminate misunderstandings about the condition of the Property.

- Answer based on actual knowledge and recollection at this time.
- Something that you do not consider material or significant may be perceived differently by a Buyer.
- Think about what you would want to know if you were buying the Property today.
- Read the questions carefully and take your time.
- If you do not understand how to answer a question, or what to disclose or how to make a disclosure in response to a question, whether on this form or a TDS, you should consult a real estate attorney in California of your choosing. A broker cannot answer the questions for you or advise you on the legal sufficiency of any answers or disclosures you provide.

3. **Note to Buyer, PURPOSE:** To give you more information about known material or significant items affecting the value or desirability of the Property and help to eliminate misunderstandings about the condition of the Property.

- Something that may be material or significant to you may not be perceived the same way by the Seller.
- If something is important to you, be sure to put your concerns and questions in writing (C.A.R. form BMI).
- Sellers can only disclose what they actually know. Seller may not know about all material or significant items.
- Seller's disclosures are not a substitute for your own investigations, personal judgments or common sense.

4. **SELLER AWARENESS:** For each statement below, answer the question "Are you (Seller) aware of..." by checking either "Yes" or "No." There is no time limitation unless otherwise specified. Explain any "Yes" answers in the space provided or attach additional comments and check paragraph 19.

5. **DOCUMENTS:** ARE YOU (SELLER) AWARE OF...  
Reports, inspections, disclosures, warranties, maintenance recommendations, estimates, studies, surveys or other documents (whether prepared in the past or present, including any previous transaction), pertaining to (i) the condition or repair of the Property or any improvement on this Property in the past, now or proposed; or (ii) easements, encroachments or boundary disputes affecting the Property whether oral or in writing and whether or not provided to the Seller.....  Yes  No  
**Note:** If yes, provide any such documents in your possession to Buyer.  
Explanation: \_\_\_\_\_

6. **STATUTORILY OR CONTRACTUALLY REQUIRED OR RELATED:** ARE YOU (SELLER) AWARE OF...  
A. Within the last 3 years, the death of an occupant of the Property upon the Property .....  Yes  No  
B. An Order from a government health official identifying the Property as being contaminated by methamphetamine. (If yes, attach a copy of the Order.) .....  Yes  No  
C. The release of an illegal controlled substance on or beneath the Property .....  Yes  No  
D. Whether the Property is located in or adjacent to an "industrial use" zone .....  Yes  No  
(In general, a zone or district allowing manufacturing, commercial or airport uses.)  
E. Whether the Property is affected by a nuisance created by an "industrial use" zone .....  Yes  No  
F. Whether the Property is located within 1 mile of a former federal or state ordnance location (In general, an area once used for military training purposes that may contain potentially explosive munitions.) .....  Yes  No  
G. Whether the Property is a condominium or located in a planned unit development or other common interest subdivision .....  Yes  No

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SPQ REVISED 12/21 (PAGE 1 OF 4)

Buyer's Initials \_\_\_\_\_ / \_\_\_\_\_ Seller's Initials \_\_\_\_\_ / \_\_\_\_\_



<b>SELLER PROPERTY QUESTIONNAIRE (SPQ PAGE 1 OF 4)</b>	
KETCHAM & ASSOC., DANIEL R., 11693 Brunswick Pines Road Grass Valley CA 95945 Daniel Ketcham	Phone: 5304778056 Fax: _____ Produced with Lone Wolf Transactions (21pForm Edition) 717 N Harwood St, Suite 2200, Dallas, TX 75201 <a href="http://www.lwoll.com">www.lwoll.com</a>





Property Address: \_\_\_\_\_, \_\_\_\_\_ County, CA

H. Insurance claims affecting the Property within the past 5 years .....  Yes  No  
 I. Matters affecting title of the Property .....  Yes  No  
 J. Material facts or defects affecting the Property not otherwise disclosed to Buyer .....  Yes  No  
 K. Plumbing fixtures on the Property that are non-compliant plumbing fixtures as defined by Civil Code § 1101.3 .....  Yes  No

Explanation, or  (if checked) see attached: Truck traffic noise, diminished air quality, ground vibrations, use of oversized materials, possible loss of well water supply, etc.

**7. REPAIRS AND ALTERATIONS: ARE YOU (SELLER) AWARE OF...**

A. Any alterations, modifications, replacements, improvements, remodeling or material repairs on the Property (including those resulting from Home Warranty claims) .....  Yes  No  
 B. Any alterations, modifications, replacements, improvements, remodeling, or material repairs to the Property done for the purpose of energy or water efficiency improvement or renewable energy? .....  Yes  No  
 C. Ongoing or recurring maintenance on the Property (for example, drain or sewer clean-out, tree or pest control service) .....  Yes  No  
 D. Any part of the Property being painted within the past 12 months .....  Yes  No  
 E. Whether the Property was built before 1978 .....  Yes  No  
 (a) If yes, were any renovations (i.e., sanding, cutting, demolition) of lead-based paint surfaces started or completed .....  Yes  No  
 (b) If yes to (a), were such renovations done in compliance with the Environmental Protection Agency Lead-Based Paint Renovation Rule .....  Yes  No  
 Explanation: \_\_\_\_\_

**8. STRUCTURAL, SYSTEMS AND APPLIANCES: ARE YOU (SELLER) AWARE OF...**

A. Defects in any of the following (including past defects that have been repaired): heating, air conditioning, electrical, plumbing (including the presence of polybutylene pipes), water, sewer, waste disposal or septic system, sump pumps, well, roof, gutters, chimney, fireplace foundation, crawl space, attic, soil, grading, drainage, retaining walls, interior or exterior doors, windows, walls, ceilings, floors or appliances .....  Yes  No  
 B. The leasing of any of the following on or serving the Property: solar system, water softener system, water purifier system, alarm system, or propane tank(s) .....  Yes  No  
 C. An alternative septic system on or serving the Property .....  Yes  No  
 Explanation: \_\_\_\_\_

**9. DISASTER RELIEF, INSURANCE OR CIVIL SETTLEMENT: ARE YOU (SELLER) AWARE OF...**

Financial relief or assistance, insurance or settlement, sought or received, from any federal, state, local or private agency, insurer or private party, by past or present owners of the Property, due to any actual or alleged damage to the Property arising from a flood, earthquake, fire, other disaster, or occurrence or defect, whether or not any money received was actually used to make repairs .....  Yes  No  
 Explanation: \_\_\_\_\_

**10. WATER-RELATED AND MOLD ISSUES: ARE YOU (SELLER) AWARE OF...**

A. Water intrusion, whether past or present, into any part of any physical structure on the Property; leaks from or in any appliance, pipe, slab or roof; standing water, drainage, flooding, underground water, moisture, water-related soil settling or slippage, on or affecting the Property .....  Yes  No  
 B. Any problem with or infestation of mold, mildew, fungus or spores, past or present, on or affecting the Property .....  Yes  No  
 C. Rivers, streams, flood channels, underground springs, high water table, floods, or tides, on or affecting the Property or neighborhood .....  Yes  No  
 Explanation: \_\_\_\_\_

**11. PETS, ANIMALS AND PESTS: ARE YOU (SELLER) AWARE OF...**

A. Past or present pets on or in the Property .....  Yes  No  
 B. Past or present problems with livestock, wildlife, insects or pests on or in the Property .....  Yes  No  
 C. Past or present odors, urine, feces, discoloration, stains, spots or damage in the Property, due to any of the above .....  Yes  No  
 D. Past or present treatment or eradication of pests or odors, or repair of damage due to any of the above .....  Yes  No  
 If so, when and by whom \_\_\_\_\_  
 Explanation: \_\_\_\_\_





Property Address: \_\_\_\_\_, CA

**12. BOUNDARIES, ACCESS AND PROPERTY USE BY OTHERS:** **ARE YOU (SELLER) AWARE OF...**

A. Surveys, easements, encroachments or boundary disputes .....  Yes  No

B. Use or access to the Property, or any part of it, by anyone other than you, with or without permission, for any purpose, including but not limited to, using or maintaining roads, driveways or other forms of ingress or egress or other travel or drainage .....  Yes  No

C. Use of any neighboring property by you .....  Yes  No

Explanation: \_\_\_\_\_

**13. LANDSCAPING, POOL AND SPA:** **ARE YOU (SELLER) AWARE OF...**

A. Diseases or infestations affecting trees, plants or vegetation on or near the Property .....  Yes  No

B. Operational sprinklers on the Property .....  Yes  No  
(a) If yes, are they  automatic or  manually operated.  
(b) If yes, are there any areas with trees, plants or vegetation not covered by the sprinkler system ...  Yes  No

C. A pool heater on the Property .....  Yes  No  
If yes, is it operational? ....  Yes  No

D. A spa heater on the Property .....  Yes  No  
If yes, is it operational? ....  Yes  No

E. Past or present defects, leaks, cracks, repairs or other problems with the sprinklers, pool, spa, waterfall, pond, stream, drainage or other water-related decor including any ancillary equipment, including pumps, filters, heaters and cleaning systems, even if repaired .....  Yes  No

Explanation: \_\_\_\_\_

**14. CONDOMINIUMS, COMMON INTEREST DEVELOPMENTS AND OTHER SUBDIVISIONS: (IF APPLICABLE)** **ARE YOU (SELLER) AWARE OF...**

A. Any pending or proposed dues increases, special assessments, rules changes, insurance availability issues, or litigation by or against or fines or violations issued by a Homeowner Association or Architectural Committee affecting the Property .....  Yes  No

B. Any declaration of restrictions or Architectural Committee that has authority over improvements made on or to the Property .....  Yes  No

C. Any improvements made on or to the Property without the required approval of an Architectural Committee or inconsistent with any declaration of restrictions or Architectural Committee requirement .....  Yes  No

Explanation: \_\_\_\_\_

**15. TITLE, OWNERSHIP LIENS, AND LEGAL CLAIMS:** **ARE YOU (SELLER) AWARE OF...**

A. Any other person or entity on title other than Seller(s) signing this form .....  Yes  No

B. Leases, options or claims affecting or relating to title or use of the Property .....  Yes  No

C. Past, present, pending or threatened lawsuits, settlements, mediations, arbitrations, tax liens, mechanics' liens, notice of default, bankruptcy or other court filings, or government hearings affecting or relating to the Property, Homeowner Association or neighborhood .....  Yes  No

D. Any private transfer fees, triggered by a sale of the Property, in favor of private parties, charitable organizations, interest based groups or any other person or entity. ....  Yes  No

E. Any PACE lien (such as HERO or SCEIP) or other lien on your Property securing a loan to pay for an alteration, modification, replacement, improvement, remodel or material repair of the Property .....  Yes  No

F. The cost of any alteration, modification, replacement, improvement, remodel or material repair of the Property being paid by an assessment on the Property tax bill! .....  Yes  No

Explanation: \_\_\_\_\_

**16. NEIGHBORS/NEIGHBORHOOD:** **ARE YOU (SELLER) AWARE OF...**

A. Neighborhood noise, nuisance or other problems from sources such as, but not limited to, the following: Neighbors, traffic, parking congestion, airplanes, trains, light rail, subway, trucks, freeways, buses, schools, parks, refuse storage or landfill processing, agricultural operations, business, odor, recreational facilities, restaurants, entertainment complexes or facilities, parades, sporting events, fairs, neighborhood parties, litter, construction, air conditioning equipment, air compressors, generators, pool equipment or appliances, underground gas pipelines, cell phone towers, high voltage transmission lines, or wildlife .....  Yes  No

B. Any past or present disputes or issues with a neighbor which could impact the use and enjoyment of the Property .....  Yes  No

Explanation: *proposed mine use will create excessive truck traffic, reduced air quality, ground vibration, use of explosive materials, etc*



Property Address: \_\_\_\_\_ nty, CA

**17. GOVERNMENTAL:** **ARE YOU (SELLER) AWARE OF...**

A. Ongoing or contemplated eminent domain, condemnation, annexation or change in zoning or general plan that applies to or could affect the Property .....  Yes  No

B. Existence or pendency of any rent control, occupancy restrictions, improvement restrictions or retrofit requirements that apply to or could affect the Property .....  Yes  No

C. Existing or contemplated building or use moratoria that apply to or could affect the Property .....  Yes  No

D. Current or proposed bonds, assessments, or fees that do not appear on the Property tax bill that apply to or could affect the Property .....  Yes  No

E. Proposed construction, reconfiguration, or closure of nearby Government facilities or amenities such as schools, parks, roadways and traffic signals .....  Yes  No

F. Existing or proposed Government requirements affecting the Property (i) that tall grass, brush or other vegetation be cleared; (ii) that restrict tree (or other landscaping) planting, removal or cutting or (iii) that flammable materials be removed .....  Yes  No

G. Any protected habitat for plants, trees, animals or insects that apply to or could affect the Property. ....  Yes  No

H. Whether the Property is historically designated or falls within an existing or proposed Historic District .....  Yes  No

I. Any water surcharges or penalties being imposed by a public or private water supplier, agency or utility; or restrictions or prohibitions on wells or other ground water supplies .....  Yes  No

J. Any differences between the name of the city in the postal/mailling address and the city which has jurisdiction over the property .....  Yes  No

Explanation: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**18. OTHER:** **ARE YOU (SELLER) AWARE OF...**

A. Any occupant of the Property smoking or vaping any substance on or in the Property, whether past or present .....  Yes  No

B. Any use of the Property for, or any alterations, modifications, improvements, remodeling or material change to the Property due to, cannabis cultivation or growth .....  Yes  No

C. Any past or present known material facts or other significant items affecting the value or desirability of the Property not otherwise disclosed to Buyer .....  Yes  No

Explanation: \_\_\_\_\_

19.  (IF CHECKED) **ADDITIONAL COMMENTS:** The attached addendum contains an explanation or additional comments in response to specific questions answered "yes" above. Refer to line and question number in explanation.

**Seller represents that Seller has provided the answers and, if any, explanations and comments on this form and any attached addenda and that such information is true and correct to the best of Seller's knowledge as of the date signed by Seller. Seller acknowledges (i) Seller's obligation to disclose information requested by this form is independent from any duty of disclosure that a real estate licensee may have in this transaction; and (ii) nothing that any such real estate licensee does or says to Seller relieves Seller from his/her own duty of disclosure.**

Seller \_\_\_\_\_ Trustee Date \_\_\_\_\_  
 Seller \_\_\_\_\_ Trustee Date \_\_\_\_\_

**By signing below, Buyer acknowledges that Buyer has read, understands and has received a copy of this Seller Property Questionnaire form.**

Buyer \_\_\_\_\_ Date \_\_\_\_\_  
 Buyer \_\_\_\_\_ Date \_\_\_\_\_

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**SELLER PROPERTY QUESTIONNAIRE (SPQ PAGE 4 OF 4)**

Produced with Lone Wolf Transactions (zipForm Edition) 717 N Herwood St, Suite 2200, Dallas, TX 75201 [www.wolf.com](http://www.wolf.com)

15 Quail Hill







CALIFORNIA  
ASSOCIATION  
OF REALTORS®

**SELLER VACANT LAND QUESTIONNAIRE**  
(C.A.R. Form VLQ, 11/12)

Seller makes the following disclosures with regard to the real property described as \_\_\_\_\_  
Assessor's Parcel No. \_\_\_\_\_, situated in \_\_\_\_\_ Nevada \_\_\_\_\_  
County of \_\_\_\_\_, California ("Property").

1. **The following are representations made by the Seller. Unless otherwise specified in writing, Broker and any real estate licensee or other person working with or through Broker have not verified information provided by Seller. A real estate broker is qualified to advise on real estate transactions. If Seller or Buyer desire legal advice, they should consult an attorney.**
2. **Note to Seller: PURPOSE:** To tell the Buyer about known material or significant items affecting the value or desirability of the Property and help to eliminate misunderstandings about the condition of the Property.
  - Answer based on actual knowledge and recollection at this time.
  - Something that you do not consider material or significant may be perceived differently by a Buyer.
  - Think about what you would want to know if you were buying the Property today.
  - Read the questions carefully and take your time.
3. **Note to Buyer: PURPOSE:** To give you more information about known material or significant items affecting the value or desirability of the Property and help to eliminate misunderstandings about the condition of the Property.
  - Something that may be material or significant to you, may not be perceived the same way by the Seller.
  - If something is important to you, be sure to put your concerns and questions in writing (C.A.R. Form BM).
  - Sellers can only disclose what they actually know. Seller may not know about all material or significant items.
  - Seller's disclosures are not a substitute for your own investigations, personal judgments or common sense.
4. **SELLER AWARENESS: For each statement below, answer the question "Are you (Seller) aware of..." by checking either "Yes" or "No." Provide explanations to answers in the space provided or attach additional comments and check paragraph 16.**
5. **BOUNDARIES, ACCESS AND PROPERTY USE BY OTHERS: ARE YOU (SELLER) AWARE OF...**
  - A. Surveys, markers, stakes, pins or maps showing the location of the Property .....  Yes  No
  - B. Any unrecorded easement, encroachment or other dispute, maintenance or use agreement affecting access to, or the boundaries of, the Property .....  Yes  No
  - C. Use of the Property, or any part of it, by anyone other than you, with or without permission, for any purpose, including but not limited to, using or maintaining roads, driveways or other forms of ingress or egress, or other travel or drainage .....  Yes  No
  - D. Leases, rental agreements, service contracts, licenses, permits or related agreements regarding use of the Property by others .....  Yes  No
  - E. Use of any neighboring property by you .....  Yes  No
  - F. The absence or limitation of legal or physical access to the Property .....  Yes  No

Explanation: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. **GEOLOGIC CONDITIONS AND ENVIRONMENTAL HAZARDS: ARE YOU (SELLER) AWARE OF...**
  - A. Fill (compacted or otherwise), soil instability, caves, mines, caverns, or slippage on the Property .....  Yes  No
  - B. Radon, methane or other gases, contaminated soil or water, hazardous waste, or waste disposal sites on the Property .....  Yes  No
  - C. Fuel, oil or chemical storage tanks above or underground .....  Yes  No
  - D. Past or present treatment or eradication of pests or odors .....  Yes  No

Explanation: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Buyer's Initials ( ) ( )

Seller's Initials ( ) ( )

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VLQ REVISED 11/12 (PAGE 1 OF 4)



**SELLER VACANT LAND QUESTIONNAIRE (VLQ PAGE 1 OF 4)**

KETCHAM & ASSOC., DANIEL R., 11693 Brunswick Pines Road Grass Valley CA 95945 Daniel Ketcham	Phone: 5304778056 Produced with Lone Wolf Transactions (zipForm Edition) 717 N Harwood St, Suite 2200, Dallas, TX 75201	Fax: www.lwlf.com	15456 Bitary
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Property Address \_\_\_\_\_ CA 95945 Date: \_\_\_\_\_

- 7. GOVERNMENTAL: ARE YOU (SELLER) AWARE OF...**
- A. Agricultural use restrictions pursuant to the Williamson Act or other law .....  Yes  No
  - B. Whether the Property is in or adjacent to an area with Right to Farm rights .....  Yes  No
  - C. Presence of any endangered, threatened, "candidate" species, wetlands, historic artifacts or human remains on the Property .....  Yes  No
  - D. Any protected habitat for plants, trees, animals or insects that apply to or could affect the Property .....  Yes  No
  - E. Conditions or laws that may affect the ability to place and/or use a manufactured home on the Property .....  Yes  No
  - F. Special taxes pursuant to the Mello - Roos Community Facilities Act, Improvement Bond Act of 1915 or other law .....  Yes  No
  - G. Ongoing or contemplated eminent domain, condemnation, annexation or change in zoning or general plan that apply to or could affect the Property .....  Yes  No
  - H. Existence or pendency of any rent control, occupancy restrictions or retrofit requirements that apply to or could affect the Property .....  Yes  No
  - I. Existing or contemplated building or use moratorium that apply to or could affect the Property .....  Yes  No
  - J. Current or proposed bonds, assessments, or fees that do not appear on the Property tax bill that apply to or could affect the Property .....  Yes  No
  - K. Proposed construction, reconfiguration, or closure of nearby government facilities or amenities such as schools, parks, roadways and traffic signals .....  Yes  No
  - L. Existing or proposed government requirements affecting the Property (i) that tall grass, brush or other vegetation be cleared; (ii) that restrict tree (or other landscaping) planting, removal or cutting, or (iii) that flammable materials be removed .....  Yes  No

Explanation: \_\_\_\_\_

- 8. WATER-RELATED ISSUES: ARE YOU (SELLER) AWARE OF...**
- A. Standing water, flooding, pumps, underground water, or water-related soil settling or slippage on or affecting the Property .....  Yes  No
  - B. Rivers, streams, flood channels, underground springs, high water table, floods or tides on or affecting the Property .....  Yes  No

Explanation: \_\_\_\_\_

- 9. UTILITIES AND SERVICES: ARE YOU (SELLER) AWARE OF...**
- A. Whether any of the following utilities or services are available ON the Property .....  Yes  No  
 If yes, check which ones:  wells  sewer  septic  sanitation  leach lines  water  
 gas  electric  telephone  cable  other \_\_\_\_\_
  - If no, are you aware of the distance such utilities or services are from the Property? .....  Yes  No

Explanation: \_\_\_\_\_

- 10. LANDSCAPING, AGRICULTURE, STRUCTURES OR OTHER IMPROVEMENTS: ARE YOU (SELLER) AWARE OF...**
- A. Diseases or infestations affecting trees, plants or vegetation on or near the Property .....  Yes  No
  - B. Diseases, infestation or other reason affecting the production of any agricultural trees or crops on the Property .....  Yes  No
  - C. Operational sprinklers or irrigation systems on the Property .....  Yes  No  
 If yes, are they  automatic or  manually operated.
  - D. Any structures or improvements (such as pad, foundations, or shelter) .....  Yes  No

Explanation: \_\_\_\_\_

- 11. NEIGHBORHOOD: ARE YOU (SELLER) AWARE OF...**
- A. Neighborhood noise, nuisance or other problems from sources such as, but not limited to, the following: neighbors, livestock, wildlife, insects or pests, traffic, parking congestion, airplanes, trains, light rail, subway, trucks, freeways, buses, schools, parks, refuse storage or landfill processing, agricultural operations, business, odor, recreational facilities, restaurants, entertainment complexes or facilities, parades, sporting events, fairs, neighborhood parties, litter, construction, air conditioning equipment, air compressors, generators, pool equipment or appliances, or wildlife .....  Yes  No

Explanation: *prepared mining operations that will create traffic noise, Air quality negative impact surrounding property*

Buyer's Initials \_\_\_\_\_ Seller's Initials \_\_\_\_\_

VLQ REVISED 11/12 (PAGE 2 OF 4) **SELLER VACANT LAND QUESTIONNAIRE (VLQ PAGE 2 OF 4)**





Property Address: \_\_\_\_\_ CA 95945 \_\_\_\_\_ Date: \_\_\_\_\_

**12. COMMON INTEREST CONDOMINIUMS AND DEVELOPMENTS: ARE YOU (SELLER) AWARE OF...**

- A. Any Homeowner or Property Owner Association (OA) governing the Property, or any pending or proposed dues increases, special assessments, rules changes, insurance, availability issues or threatened or pending litigation by or against the OA affecting the Property .....  Yes  No

Explanation: \_\_\_\_\_

**13. TITLE, OWNERSHIP AND LEGAL CLAIMS: ARE YOU (SELLER) AWARE OF...**

- A. Any other person or entity on title other than Seller(s) signing this form .....  Yes  No  
 B. Leases, options or claims affecting or relating to title or use of the Property .....  Yes  No  
 C. Any other person or entity other than Seller(s) signing this form with a legal claim to oil, mineral, gas or water rights .....  Yes  No  
 D. Past, present, pending or threatened lawsuits, mediations, arbitrations, tax liens, abatement liens, mechanics' liens, notice of default, bankruptcy or other court filings, or government hearings affecting or relating to the Property, OA or neighborhood .....  Yes  No

Explanation: \_\_\_\_\_

**14. DISASTER RELIEF, INSURANCE OR CIVIL SETTLEMENT: ARE YOU (SELLER) AWARE OF...**

- A. Financial relief or assistance, insurance or settlement, sought or received, from any federal, state, local or private agency, insurer or private party, by past or present owners of the Property, due to any actual or alleged damage to the Property arising from a flood, earthquake, fire, other disaster, or occurrence or defect, whether or not any money received was actually used to correct damage .....  Yes  No

Explanation: \_\_\_\_\_

**15. OTHER: ARE YOU (SELLER) AWARE OF...**

- A. Reports, inspections, disclosures, warranties, maintenance recommendations, estimates, studies, surveys or other documents, pertaining to the condition of the Property or easements, encroachments, boundary disputes or environmental conditions affecting the Property .....  Yes  No  
 (If yes, provide any such documents in your possession to Buyer)  
 B. Department of Real Estate Public Report, or subdivision map .....  Yes  No  
 C. An Order from a government health official identifying the Property as being contaminated by methamphetamine. (If yes, attach a copy of the Order.) .....  Yes  No  
 D. The release of an illegal controlled substance on or beneath the Property .....  Yes  No  
 E. Whether the Property is located in or adjacent to an "industrial use" zone .....  Yes  No  
 (In general, a zone or district allowing manufacturing, commercial or airport uses.)  
 F. Whether the Property is affected by a nuisance created by an "industrial use" zone .....  Yes  No  
 G. Whether the Property is located within 1 mile of a former federal or state ordnance location .....  Yes  No  
 (In general, an area once used for military training purposes that may contain potentially explosive munitions.)  
 H. Whether the Property is a condominium or located in a planned unit development or other common interest subdivision .....  Yes  No  
 I. Insurance claims affecting the Property within the past 5 years .....  Yes  No  
 J. Matters affecting title of the Property .....  Yes  No  
 K. Any past or present known material facts or other significant items affecting the value or desirability of the Property not otherwise disclosed to Buyer .....  Yes  No

Explanation: proximity to nearby mining operation that creates noise, truck traffic, poor air quality, ground vibrations etal

16.  (IF CHECKED) **ADDITIONAL COMMENTS:** The attached addendum contains an explanation or additional comments in response to specific questions answered "yes" above. Refer to line and question number in explanation.

Buyer's Initials ( ) ( )

Seller's Initials ( ) ( )

VLQ REVISED 11/12 (PAGE 3 OF 4)

**SELLER VACANT LAND QUESTIONNAIRE (VLQ PAGE 3 OF 4)**

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Property Address: \_\_\_\_\_ CA 95945 \_\_\_\_\_ Date: \_\_\_\_\_

Seller represents that Seller has provided the answers and, if any, explanations and comments on this Form and any attached addenda and that such information is true and correct to the best of Seller's knowledge as of the date signed by Seller. Seller acknowledges (i) Seller's obligation to disclose information requested by this Form is independent from any duty of disclosure that a real estate licensee may have in this transaction, and (ii) nothing that any such real estate licensee does or says to Seller relieves Seller from his/her own duty of disclosure.

Date _____	Date _____
SELLER _____ <u>Administrator</u> _____	SELLER _____ <u>Individual</u> _____
By _____	By _____
Print name _____	Print name _____
Title _____	Title _____

By signing below, Buyer acknowledges that Buyer has read, understands and has received a copy of this Seller Vacant Land Questionnaire form.

Date _____	Date _____
BUYER _____	BUYER _____
By _____	By _____
Print name _____	Print name _____
Title _____	Title _____

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**VLQ REVISED 11/12 (PAGE 4 OF 4)**

**SELLER VACANT LAND QUESTIONNAIRE (VLQ PAGE 4 OF 4)**

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15456 Bitney



## **INDIVIDUAL LETTER 495: LINDA AND DANIEL KETCHAM**

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### **Response to Comment Ind 495-1**

The commenter generally identifies a number of impacts identified in the DEIR but does not state how the DEIR is inadequate with regard to the analysis of these impacts. The commenter references traffic impacts, noise from project trucks, degradation of air quality, adverse impacts to private wells, and hazardous waste disposal. Each of these potential impacts were analyzed in the following DEIR Chapters: Chapter 4.12 (Transportation), Chapter 4.10 (Noise and Vibration), Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). Traffic is analyzed in Chapter 4.12 of the DEIR, noise is analyzed in Chapter 4.10 of the DEIR, air quality is analyzed in Chapter 4.3 of the DEIR, impact to wells is analyzed in Chapter 4.8 of the DEIR, and hazards and hazardous waste is analyzed in Chapter 4.7 of the DEIR.

### **Response to Comment Ind 495-2**

The commenter is concerned the project will negatively impact property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 495-3**

The commenter requests that the DEIR include an economic impact analysis to quantify potential impacts to property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.



**Individual Letter 496**

**From:** Linda Meyers <lulucoyote@gmail.com>  
**Sent:** Sunday, April 3, 2022 7:49 PM  
**To:** Idaho MMEIR  
**Subject:** Idaho Maryland Mine

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I'll keep this short and to the point.  
Please count my voice in OPPOSITION to reopening the Idaho Maryland mine by Rise Gold.  
I am a Nevada City resident and homeowner.

We need to be protecting our environment. This region has been irreparably damaged by extractive mining. No more.  
There are many other cleaner industries that can and will enrich our economy.  
Rise Gold is a foreign company lacking in competence and integrity. I am not fooled.

No. No No.

Sincerely,  
Linda Meyers  
Nevada City, CA

**Ind 496-1**



## **INDIVIDUAL LETTER 496: LINDA MEYERS**

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### **Response to Comment Ind 496-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 497**



April 11, 2022  
Via E-mail to: [Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)  
Matt Kelley – Senior Planner  
Nevada County Community Development Agency

Re: **Idaho Maryland Mine  
Response to Draft EIR**

Dear Matt,

Thank you for your hard work on the complicated and controversial Idaho Maryland Mine project that is proposed by project applicant Rise Grass Valley. Please see my below comments to the draft Environmental Impact Report.

**Ind 497-1**

**Aesthetics**

The draft EIR does not evaluate the aesthetic impact of 24/7 use of heavy equipment at the Centennial Site. Are the hours of operation at the Centennial Site limited or are they authorized to operate 24 hours per day 7 days per week? If so, will there be light impacts at this site from heavy equipment use? The Centennial Site is proposed to be used for 5 years and the appearance of heavy equipment (and their use of lights) is not a temporary construction related impact and should be analyzed as such—a long term impact.

**Ind 497-2**

Mitigation Measure 4.1-2 is insufficient. Engineered graded fill is permanent and the 50' tall mound of soil will be visible from Highway 49 through Grass Valley forever. A landscaping plan will never sufficiently screen views of the proposed fill site because the land between the highway and the site is private property and will not be included in a landscape plan and therefore this mitigation measure does not improve the view of the site from Highway 49.

**Ind 497-3**

**Hazards and Hazardous Materials**

Diesel is not analyzed in the document. Equipment used for the proposed project will require large amounts of diesel to power the machinery. The transportation of large quantities of diesel needs to be evaluated in the document.







<b>Ind 497-4</b>	<p><b>Hydrology and Water Quality</b></p> <p>Much of the analysis within the referenced hydrologic studies in the EIR assume that the project applicants will utilize existing mine shafts for their mining operations but that is not specified in the project description or otherwise. Overall, exploratory mining and creating new shafts and potentially affecting the water table in unanticipated ways is not addressed in this section. The work that has been done to inform the EIR utilizes historic information and attempts to “map out” the existing conditions of the mine workings and shafts below Grass Valley. Therefore, the analysis is insufficient and analyzes operational effects based on these known shafts. Additional analysis is needed to analyze the drawdown impacts to a much larger area and mitigation measures are necessary to ensure that mining activities do not affect the water table throughout the area of the applicant’s mineral rights, not only in the immediate vicinity of the Brunswick site.</p>
<b>Ind 497-5</b>	<p>The Well Mitigation Plan provided as an appendix by Rise Grass Valley underplays the potential for well water draw down within the Grass Valley area and uses language that does not ensure that corrective action will be taken if wells are affected outside of their expected impact area. This document needs to be re-written with pre-defined sampling locations throughout the mineral rights area and explicit corrective actions if wells in the area are affected. The Well Mitigation Plan should include parcels (to be serviced by NID) that are currently undeveloped or vacant.</p>
<b>Ind 497-6</b>	<p>It is not clear within the EIR the amount of water that is able to be treated prior to release into South Fork Wolf Creek. EMKO states that initial de-watering will take over 5 months to extract 385 million gallons of water from the existing shafts and associated groundwater table. Will these 385 million gallons be treated prior to entering Wolf Creek? If not, does the proposed project include sufficient water treatment facilities for this volume of water?</p>
<b>Ind 497-7</b>	<p><b>Land Use</b></p> <p>The EIR utilizes data from 2018 to project housing vacancy rates. This is insufficient and needs further analysis. Vacancy rates are very low in Nevada County especially since the COVID-19 pandemic when many families and professionals migrated out of the city centers and to the foothills. The vacancy rate of 22.5% as stated in the EIR needs to be struck out and this topic needs to be re-evaluated with the source of information provided in the document. Available housing in both the rental and real estate markets is very low and the potential for over 300 families to our area will have a significant impact which should require mitigation.</p>





A project of this scale and nature should never be proposed, approved, constructed, or allowed within a town. Especially a beautiful and scenic rural town in Northern California whose residents will see no benefit from the heavy industrial nature of such an intense use of the land.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lisa McCandless".

Lisa McCandless  
Land Planner/Owner  
Insight Land Planning, LLC

Ind 497-8



## **INDIVIDUAL LETTER 497: LISA MCCANDLESS**

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### **Response to Comment Ind 497-1**

The commenter states that the DEIR fails to discuss the aesthetic impacts from the use of heavy equipment at the Centennial Site and asks whether the heavy equipment would be used 24 hours a day, 7 days a week. The commenter also expresses concern over light impacts at the Centennial Site from the use of heavy equipment. Lastly, the commenter states that the aesthetic impact of heavy equipment use at the Centennial Industrial Site will occur over 5 years and should not be analyzed as a temporary construction impact.

Heavy equipment use at the Centennial Industrial Site will consist of haul trucks and equipment on-site to place, grade, and compact the engineered fill. (DEIR, p. 3-33.) The DEIR anticipates that trucks would transport engineered fill from the Brunswick Industrial Site to the Centennial Industrial Site 16 hours a day, 7 days a week, rather than 24 hours a day, 7 days a week, as incorrectly asserted by the Commenter. (DEIR, p. 3-26.) Hauling and dumping of engineered fill would occur at the Centennial Industrial Site between 6:00AM and 10:00PM, while placement, compaction, and grading of the engineered fill would occur between 7:00AM and 3:30PM. (DEIR, p. 4.1-23.)

Regarding light pollution at the Centennial Industrial Site, the project would not include the installation of any new lighting elements on the Centennial Industrial Site. (DEIR 4.1-23.) Lighting during nighttime hauling and dumping of engineered fill would be limited to haul truck headlights. On-site mobile equipment would not include the addition of substantial reflective surface that would affect the surrounding area. Therefore, the potential for the proposed project to create a new source of substantial light or glare that would adversely affect day or nighttime views in the vicinity of the Centennial Industrial Site would be less than significant. (DEIR, p. 4.1-23.)

Regarding the aesthetic impacts from the use of heavy equipment at the Centennial Industrial Site, the DEIR concludes that the project would substantially degrade the existing visual character or quality of public views and that these impacts are significant and unavoidable. (DEIR, p. 4.1-14–15.) The inclusion of additional analysis of industrial vehicles and mining equipment in the aesthetics analysis would not change the significance finding.

### **Response to Comment Ind 497-2**

The commenter states that Mitigation Measure 4.1-2 is insufficient, specifically with regard to the engineered graded fill piles on the Centennial Site, which the commenter asserts would be visible from Highway 49. The DEIR concurs in that it concludes that visual impacts in this regard would be significant and unavoidable even after implementation of mitigation. (DEIR, p. 4.1-14–15.)

### **Response to Comment Ind 497-3**

The commenter states that the DEIR fails to discuss the use of diesel fuel, which would be necessary for the project. However, the DEIR does analyze the use and transport of diesel fuel (DEIR, p. 4.7-29–30.) The DEIR states that:

“various pieces of equipment would be used, requiring the need for diesel fuel. Diesel fuel consumption would vary between 450 to 850 gallons per day, depending on the location where engineered fill is trucked. During normal operations, an average of one 7,500-gallon fuel tanker would travel to/from the sites every nine days, using Brunswick Road to SR 20/49, over the 80-year term of the Use Permit. During any public safety power shutoff events, a maximum of two fuel tankers per day would be required due to additional fuel demands associated with backup generators.” (DEIR, p. 4.7-29.)



Because the proposed project would involve the use and storage of a number of hazardous materials, the Project Applicant would be required to obtain a number of permits and approvals from regulatory agencies, as well as comply with all applicable federal, state, and local regulations for the handling, storage, and transportation of hazardous and toxic materials. (DEIR, p. 4.7-30.) Mitigation Measure 4-7-1(d) requires that prior to the transport, storage, or use of hazardous materials at the site, the mine operator shall prepare a Hazardous Materials Business Plan (HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials or explosives on-site, including diesel fuel. (DEIR, p. 4.7-31.)

#### **Response to Comment Ind 497-4**

The commenter states that the DEIR's hydrologic studies are inadequate because the analysis assumes that existing mine shafts will be used for mining operations, rather than newly constructed mine shafts. As discussed on pages 3-21 and 3-22 of the DEIR, the existing Brunswick Shaft and a newly constructed Service Shaft would be used in the proposed operation. Other historic shafts would not be used.

The proposed service shaft was included in the groundwater model, and a small cone of depression is clearly shown at the proposed service shaft location on Sheet 12 of DEIR Appendix K.2 (located near the center of the Brunswick Industrial Site). All mine workings, including those within a few hundred feet of the surface, were included in the groundwater model (see Figure 2-3 of Appendix K.3).

The commenter states that the analysis of the DEIR is insufficient because operation effects beyond the historic workings (shafts) has not been conducted and that analysis of the drawdown impacts to a much larger area is necessary to ensure that mining activities do not affect the water table throughout the mineral rights area. However, Chapter 4.8 the DEIR discusses the new mine workings that would be constructed and displays the area of predicted drawdown from the construction of these new workings in Figure 4.8-11 and in Appendices K.2 and K.3 of the DEIR. The simulated drawdown is based on the modelled geology and location of underground mine workings, amongst other factors. Please see Master Response 7 – Location of Future Mining Areas and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As discussed in Master Response 7, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps A101, A201 and A202 included as Appendix A to this Final EIR).

#### **Response to Comment Ind 497-5**

The Well Mitigation Plan is not intended to discuss the potential for well water drawdown. Rather, it is intended to provide a plan of actions that would be taken if the groundwater monitoring plan predicted an impact to a domestic water well. The commenter is referred to the Groundwater Monitoring Plan (Appendix K.8 of the DEIR), which discusses pre-defined sampling locations through the mineral rights area. The Well Mitigation Plan has been edited to clarify the performance standards required for Well Mitigation (see Appendix D to this Final EIR). Performance standards are based on actual use of water for similar property types and not the maximum potential of domestic water wells. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.



Parcels that are currently undeveloped or vacant are not users of groundwater and therefore cannot be impacted by the project. However, one vacant property in the E. Bennett area will be provided NID potable water connection. Property owners of vacant land would not be eligible for reimbursement of NID water charges. The well mitigation plan has been revised to clarify that if the groundwater monitoring plan predicts a potential impact to domestic water wells outside of the E. Bennett Road Area, then nearby properties which do not have well completion records, or a previous negative confirmation, will also be contacted to verify whether there is a well on the property. This would mitigate impacts to properties that are currently vacant but construct a well during the period before a projected impact.

**Response to Comment Ind 497-6**

As stated on page 4.8-45, the maximum discharge rate permitted would be 2,500 gpm and the treatment plant is designed to be able to treat this maximum capacity (see Appendix K.4). All water discharged would be treated prior to entering South Fork Wolf Creek. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

**Response to Comment Ind 497-7**

The commenter believes that vacancy rates are currently lower due to the COVID-19 pandemic and that the significance conclusion of the DEIR would change and require mitigation. The vacancy rates shown in Table 4.9-5 of the DEIR are broken down by area and 22.5% is the average vacancy rate for Nevada County. Vacancy rates range from 8% in Grass Valley and Nevada City to 51% in Truckee. This data, derived from the 2019 Nevada County Housing Element Update, is from before the COVID-19 pandemic and is the most current information available for use in the analysis of the DEIR. The commenter does not suggest any more current source of data, or show evidence that vacancy rates are so low that the region would not have capacity for any workers moving into the area.

**Response to Comment Ind 497-8**

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.





**Individual Letter 498**

**From:** [Lisa Nowlain](#)  
**To:** [Idaho MMEIR](#)  
**Subject:** Re: Notice of Availability of a Draft Environmental Impact Report (EIR) and Notice of Public Meeting to Provide Comments on the Idaho-Maryland Mine Draft EIR  
**Date:** Tuesday, January 4, 2022 6:54:09 PM  
**Attachments:** [image001.jpg](#)  
[EIR19-0001 Idaho-Maryland Mine DEIR NOA Final.pdf](#)

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**Ind 498-1**

Thank you!

Sent from a machine with tiny keys

On Jan 4, 2022, at 7:53 AM, Idaho MMEIR <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)> wrote:

Good Morning:

Attached please find a copy of the Notice of Availability of a Draft Environmental Impact Report (EIR) and Notice of Public Meeting to Provide Comments on the Idaho-Maryland Mine Draft EIR Project.

The Draft EIR, Notice of Availability and other project materials are now available for public review and download on the Nevada County website at: <https://www.mynevadacounty.com/3195/Idaho-Maryland-Mine---Rise-Grass-Valley>.

Thank you,

**Matt Kelley**  
*Senior Planner*



**Planning Department**  
**County of Nevada**  
**Community Development Agency**

950 Main Ave. Suite 170  
PO Box 599002  
Nevada City, CA 95959-  
7902

office: 530-265-1423  
<https://www.mynevadacounty.com/512/Planning-Department>

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*I am out of the office every other Friday as follows: 1/7, 1/21, 2/4, 2/18, 3/4...*

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The Customer Service Counter for Nevada County CDA - Planning Department is open from 8:00am – 3:30pm for walk-ins and for appointments. To schedule an appointment with staff please contact the Planning Department at 530-265-1222 Option 2 or [planning@co.nevada.ca.us](mailto:planning@co.nevada.ca.us). If you have any questions about our services, please contact us by email at [planning@co.nevada.ca.us](mailto:planning@co.nevada.ca.us) or by phone at 530-265-1222 Option 2.



## **INDIVIDUAL LETTER 498: LISA NOWLAIN**

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### **Response to Comment Ind 498-1**

The comment does not address the adequacy of the DEIR.



**Individual Letter 499**

**From:** [J.RoweGreenway](#)  
**To:** [bdofsupervisors](#)  
**Subject:** Idaho Maryland Mine - citizen comment  
**Date:** Saturday, February 19, 2022 8:59:40 AM

Dist 3

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Ind 499-1

**Dear Nevada County Supervisors,**

**Now is not the time to jeopardize tourism or property values. The traffic and noise impacts, as well as long term risk to our water and air, do not help our businesses, employment or residents. As a long time Nevada County citizen and homeowner in downtown Grass Valley, I appeal to your wisdom and love of our community. Please do not approve the re-opening of the Idaho Maryland Mine.**

**Lisa Rowe  
126 Jan Rd, Grass Valley, CA 95945**



## **INDIVIDUAL LETTER 499: LISA ROWE**

---

### **Response to Comment Ind 499-1**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.





Individual Letter 500

Dist 3

Ind 500-1

**DO NOT !! I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 100 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to support the re-opening of the Idaho-Maryland Mine.

**DO NOT SUPPORT**

**STOP MINE!**

Name(s) LIZARY + JEREMY JONES

Address 15770 Ridge Estates Rd ZIP 95959

Phone 530-263-3860

Email Address lizaryj@gmail.com



## **INDIVIDUAL LETTER 500: LIZARY AND JEREMY JONES**

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### **Response to Comment Ind 500-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 501**

**From:** [Lorraine Hendriksen](#)  
**To:** [Matt Kelley](#)  
**Subject:** Re: Idaho Maryland Mine public comment  
**Date:** Thursday, February 17, 2022 7:47:45 PM  
**Attachments:** [image001.jpg](#)

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**Ind 501-1**

Dear Mr. Kelley,  
My opinion stands. Please do not let the Mine open. It will destroy our community. I will surely leave the county, as will many of my friends. Our property values will plummet. Please do not let this happen to our wonderful home.  
Thank you for your time,  
Lorraine Hendriksen  
  
Sent from my iPhone

On Aug 24, 2020, at 6:16 AM, Matt Kelley <[Matt.Kelley@co.nevada.ca.us](mailto:Matt.Kelley@co.nevada.ca.us)> wrote:

Good Morning Ms. Hendriksen:

Thank you, we have received your comments on the Notice of Preparation of an Environmental Impact Report (EIR) for the Idaho-Maryland Mine – Rise Grass Valley Project and the scope of the EIR analysis and they will be forwarded to the EIR consultant and the project applicant for review and consideration into the scope of the EIR.

Below is a link to the project application materials which can provide you with additional details and supporting documents related to the proposed project:  
<https://www.mvnevadacounty.com/2881/Idaho-Maryland-Mine---Rise-Grass-Valley>

We are early in the process of reviewing and evaluating the proposed project and are just initiating the preparation of the Environmental Impact Report. As required by the California Environmental Quality Guidelines (CEQA), there are requirements which are governed by California State Law that require the EIR analyze and evaluate certain issue areas including but not limited to: Hydrology and Water Quality, Traffic and Transportation, Noise, Biological Resources, Air Quality Impacts, Greenhouse Gas Emissions, Geology/Soils, Hazards / Hazardous Materials, Cultural Resources, Wildfire, and Mineral Resources. These issue areas will be analyzed in the EIR based on technical



studies that were submitted by the applicant and that were prepared by professionals in their respective fields. These technical studies will also be peer reviewed by the outside consulting firm that the County has contracted with to prepare the EIR. Drafting of the EIR will take many months to complete and is currently anticipated to be completed in late Fall, 2020.

Once the Draft EIR is completed, a Notice of Availability (NOA) will be released which will begin a minimum of a 45-day review and comment period to provide interested individuals an opportunity to review and respond to the adequacy of the draft EIR prepared for the proposed project. During the 45 days, a public meeting will occur to accept comments on the EIR in addition to any emails or written comments that are submitted during the public review period. The public meeting will be noticed as part of the release of the NOA for the draft EIR. The EIR consulting firm will take all of the comments received and will respond to all comments in writing as part of the Final EIR. As part of the Final EIR, it will contain any additions or revisions to the Draft EIR based on the public and agency comments received as well as all of the written responses to all of the comments received during draft EIR comment period. The Final EIR will be released for a public comment period of not less than 10 days as required by California State Law and before any public hearings are held to consider the proposed project. A noticed Planning Commission hearing will be held to consider the project and the EIR and there is the potential for there to be multiple hearings before the Planning Commission. All comments received during the entire process will be part of the record for consideration by the Planning Commission. The Planning Commission will make a recommendation to the Board of Supervisors on the proposed project. After a recommendation is made on the project by the Planning Commission, a public hearing will then be scheduled before the Board of Supervisors to consider the proposed project, the Environmental Impact Report and the Planning Commission's recommendations along with all public comments received throughout the process. As required, and similar to the Planning Commission public hearing(s) the Board of Supervisor public hearing(s) will be properly noticed and will provide an additional opportunity for the public and agencies to provide comments on the proposed project. The Board of Supervisors will take action on the proposed project during their noticed public hearing.

Available application materials and supporting documents related to the proposed project including the Notice of Preparation, Project Description, and project application materials are available for public review at the Planning Department office at 950 Maidu Avenue, Suite 170, Nevada City, CA 95959 or they may be viewed at <https://www.mvnevadacounty.com/2881/Idaho-Maryland-Mine---Rise-Grass-Valley>.

Thank you again for your comments on the Notice of Preparation of the EIR. There will be additional opportunities to comment on the proposed project throughout the EIR and public hearing processes.

If you have any additional questions, please let me know at your convenience.





Sincerely,

**Matt Kelley**  
Senior Planner



**Planning Department  
County of Nevada  
Community Development Agency**

950 Maidu Ave. Suite 170  
Nevada City, CA 95959

office 530.265-1122  
<https://www.mynevadacounty.com/512/Planning-Department>

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The Nevada County Community Development Agency customer service counter is now open by appointment only. Appointments are available Monday through Thursday, 9 am - 11 am, and 1 pm - 3 pm daily. To schedule an appointment please contact the Planning Department at 530-265-1222 option 2 at least one day in advance. The Planning Department will be continuing to provide services through email, phone, and online services. Applications for permits are available through our website at <https://www.mynevadacounty.com/512/Planning-Department>. Before submitting an application, please contact the Planning Department and speak with a Planner. If you have any questions and/or concerns please don't hesitate to contact us directly at [planning@co.nevada.ca.us](mailto:planning@co.nevada.ca.us) or 530-265-1222 Option 2.

-----Original Message-----

From: Lorraine Hendriksen <lorraine.hendriksen@gmail.com>  
Sent: Monday, August 17, 2020 2:59 PM  
To: Matt Kelley <Matt.Kelley@co.nevada.ca.us>  
Subject: Idaho Maryland Mine public comment

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**Ind 501-2**

Dear Mr. Kelley,  
Thank you for reading this public comment regarding the possible reopening of the old mine near Brunswick road. While it's unlikely I'll say anything you haven't already heard, I felt it important to write. I felt especially compelled, given the lack of communication and information regarding this project. It seems that even this public comment time was not made especially public, a lot of us caught by surprise of news of the project, including the immediate deadline for these submissions.

▼ I have lived in the county for nearly 40 years. I have owned or been a part of many





↑ businesses and facets of the county. In that time I have seen several companies attempt this project. There are simply too many concerns that cannot be addressed and guaranteed. Water (currently more valuable than gold), pollution of every kind, traffic, destruction of ecosystems, underfunded companies not being able to fulfill obligations. It all spells danger for our community.

While I have your attention, who do I speak with about the 174 project? It's great Caltrans is trying to make things safer. We have all heard rumors though of an increased speed limit. Making the road straighter and raising the speed limit is not the right idea. We don't want and can't turn into another 49. Please don't raise the speed limit. How about a signal at You Bet Road? How about law enforcement out there once in a while to remind people to slow down? Please help. There are too many things that are trying to be pushed through while we are all dealing with our world crisis. It will not end well if big mistakes are made. We all want to protect this beautiful place we call home.

Thank you for your time. Im sorry this got as long as it did. It's important though that we stay involved with our community, and help move forward with integrity and care. To that end, thank you for your help.

Sincerely,  
Lorraine Hendriksen



## **INDIVIDUAL LETTER 501: LORRAINE HENDRIKSEN**

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### **Response to Comment Ind 501-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 501-2**

Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.



**Individual Letter 502**

**From:** [Lorraine Hendriksen](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** PLEASE DONT ALLOW MINE  
**Date:** Tuesday, March 15, 2022 10:07:02 AM

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**Ind 502-1**

Dear Committee,  
I am writing with regards to the proposed Idaho Maryland Mine. Do we need any more to worry about or guard against, no. Please do not allow this charade to go on any further, it is a waste of time, money and energy, all already stressed and unable to manage what we have. The work the mine will require will RUIN our county. It is appalling to me, after so many past attempts, that this is even considered. Please beware of greed.

**Ind 502-2**

Water, noise, traffic, property value decrease, overall long and short term disruption and degradation of the environment, pollution, stress, anger, frustration. The overall cost of monitoring their operations, making sure they do the right thing, which they don't have a history of, is another added stress on every level.

**Ind 502-3**

I have lived in this beautiful place for more than 40 years. I've seen a lot of change in that time, some welcomed, some not so much. Opening the Mine would change everything. Most of my friends and I would leave. Please, you cannot approve this. Stop this crazy stressful time consuming destructive project now. Our county population is overwhelmingly against it. Please start listening to us instead of your bank accounts and political aspirations. I am writing because I care about our county, our homes. We cannot afford to do this, on any level in any way. It is all too precious.

Thank you for your time,  
Lorraine Hendriksen

Sent from my iPhone



## **INDIVIDUAL LETTER 502: LORRAINE HENDRIKSEN**

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### **Response to Comment Ind 502-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 502-2**

Please see Master Responses 1 through 3. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 502-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 503**

**From:** Lorraine Reich <reichlawoffice@gmail.com>  
**Sent:** Wednesday, March 23, 2022 1:38 PM  
**To:** Idaho MMEIR  
**Subject:** Re-Opening of the Idaho Maryland Mine

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Dear Planning Commission and Board of Supervisors:

**Ind 503-1**

I am a 30+ year resident of Nevada City where I own my residential property. I also own property where I have my business located at 254 Colfax Avenue in Grass Valley. It is my business property that will be heavily impacted by the reopening of this mine.

Here are my concerns:

**Ind 503-2**

There are 100 miles of tunnels running beneath the boundaries of Grass Valley City that are already full of toxic water from the 1800's mining operations. Any new mining operation will necessarily be required to use millions of gallons of water with much of that water flowing back into these toxic tunnels, and back into our water sources and watershed. The use of this amount of water required for mining operations is unsustainable and arguably unethical in these times of drought and climate change. It will be getting hotter, and Nevada County residents will be using more water for their daily needs. They should not have to compete with a for-profit Canadian mining corporation which has no moral compulsion to minimize its use of our precious water.

**Ind 503-3**

As a business owner in Grass Valley, I remain concerned over the level of noise, air pollution, and machinery/trucks rolling through our streets that will be caused by the mining operation. There are no mitigation devices I can imagine that would offset the negative impact these concerns will have on the quality of our lives or our population.

I am against the Rise gold Mining Operation because it has no foreseeable benefits to the local Nevada County residents.

Lorraine Reich  
(530) 274-1077





## **INDIVIDUAL LETTER 503: LORRAINE REICH**

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### **Response to Comment Ind 503-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 503-2**

Please see Master Responses 8 through 10 and 13 through 16. In addition, please see Master Response 3. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 503-3**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.



**Individual Letter 504**

Lorraine Walter & Terry Sullivan  
10970 Gold Hill Drive  
Grass Valley, CA 95945

April 4, 2022

To: Members of the Nevada County Planning Commission, Nevada County Board of Supervisors, and Nevada County Planning Department Staff

Attn: Matt Kelley, Senior Planner  
950 Maidu Ave, Suite 170  
Nevada City, CA 95959  
Ph: 530.265-1423  
Email: [matt.kelley@co.nevada.ca.us](mailto:matt.kelley@co.nevada.ca.us)  
DEIR Comment Email: [idaho.mmeir@co.nevada.ca.us](mailto:idaho.mmeir@co.nevada.ca.us)

Comments on the Draft Environmental Impact Report for the Idaho-Maryland Mine Project

To All Concerned:

This is to express my grave concerns about the proposal to re-open the Idaho-Maryland Mine and the clear inadequacy of the applicant's draft environmental impact report (DEIR).

I (Lorraine) am a seasoned environmental professional, having worked as a land use planner for local government for many years and as a watershed planner/coordinator. I am well acquainted with CEQA and the analysis of potential environmental impacts. My husband (Terry) owns several commercial properties in Grass Valley.

As was well summarized by the many expert testimonials at the recent Planning Commission hearing, the data and analyses in the DEIR fail to meet the standards of adequacy on many fronts. While I have concerns about many of the impacts the mine would certainly bring, I have chosen to focus this letter on the topic of water, because of the life-critical nature of this resource, especially at this very unstable time we are in.

Our community is in a position with regard to water resources that many across the state and nation would envy, that is we have a decent supply and quality of this precious resource. We cannot take this for granted and we should not hand this priceless asset over to a corporation with short-term interests.

I concur with the analyses that have been done of the DEIR by the Nevada Irrigation District (NID), the Wells Coalition, the Community Environmental Advocates, and other experts related to the project's potential impacts to local water supplies and water quality. Specifically:

**The groundwater impact assessment is flawed and inadequate.**

- The data inputs used in the analysis contradict the data of more reliable sources.
- The analysis provides no water balance assessment to justify inflow/outflow estimates.
- Seasonal variations in water levels are based on only a few years of data.

Ind 504-1

Ind 504-2

1 of 3



Ind 504-3	<ul style="list-style-type: none"><li>• The model omits the effect of the project's planned new access shaft, as well as other existing features that would affect groundwater levels.</li><li>• The impact of existing faults in the area was not factored in.</li></ul> <p><b>The plan for groundwater monitoring is flawed and inadequate.</b></p> <ul style="list-style-type: none"><li>▪ The DEIR tries to defer collection of needed additional groundwater data to future monitoring. Since the project's impacts to groundwater are likely to directly affect hundreds of residents living near the project who rely on groundwater, the assessment of these potential impacts cannot be deferred to the future, nor is this allowed per CEQA.</li><li>▪ The DEIR proposes an inadequate number of monitor wells (i.e., 15) given the large area of potential impacts and the complex, fractured bedrock nature of the hydrology.</li></ul>
Ind 504-4	<p><b>The proposed mitigation for groundwater impacts is woefully inadequate.</b></p> <ul style="list-style-type: none"><li>▪ According to the Wells Coalition, there are 525 private wells within a half mile of the mineral rights boundary, yet the DEIR proposes to mitigate for only 30 potentially impacted wells. The area of potential impact has not been adequately defined, especially given the complex nature of fractured rock hydrology and the high level of uncertainty in hydrologic models. NID's request for an additional water line to be installed in the Whispering Pines area to mitigate for potentially impacted wells validates this concern.</li><li>▪ The Well Mitigation Plan offers no plan to track well history so that impacts to surrounding wells can be verified, leaving residents on their own to claim damages.</li><li>▪ As pointed out by NID, the proposed water supply mitigation measure underestimates the water supply demand of impacted properties.</li><li>▪ The mitigation measure to compensate impacted well owners is written to expire at the sale of the property, whereas true compensation of impacts would have the mitigation obligation attached to deed itself.</li><li>▪ The costs to restore water service and supply interim water to impacted well owners is not adequately addressed, nor is the loss in property values that the lack of water supply would create for residents until water service with NID could be established.</li><li>▪ The mitigation does not provide adequate financial assurance, such as a bond, to cover the potential water related impacts to landowners in the vicinity of the project.</li></ul>
Ind 504-5	<p><b>The water quality impacts to the South Fork Wolf Creek—including increases in water temperature, water volume, and toxic heavy metals—were not adequately assessed.</b></p> <ul style="list-style-type: none"><li>▪ The number of water quality samples used for the analysis was insufficient and the location of the sampling is in question.</li><li>▪ Water quality sampling of the South Fork Wolf Creek by the community for over 15 years has provided fine-scale data on historic water temperature by season. These data contradict water temperature data presented by the applicant.</li><li>▪ The assessment of the potential for the mine's waste rock to produce poor quality water discharge over the long term was not performed pursuant to Water Board standards.</li></ul>



**Ind 504-6**

It is unfortunate that at a time of growing uncertainty on so many fronts—including the consequences of extended droughts and extreme weather events—our community members must divert their attention and resources to the topic of defeating a commercial venture that could have devastating long-term impacts.

Now is the time to be putting everything we have into becoming more locally self-reliant and resilient. And to do this well requires the most prudent use of our limited water resources.

I hope you will do all that you can to ensure this poorly designed and inadequately assessed project does not move forward and further strain the resources of our community.

Thank you for your consideration and for your service.

Sincerely,

Lorraine Walter and Terry Sullivan  
Nevada County residents and local business owners





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## **INDIVIDUAL LETTER 504: LORRAINE WLATER AND TERRY SULLIVAN**

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### **Response to Comment Ind 504-1**

The commenter states that the DEIR is inadequate but does not provide additional information. Responses to specific comments are provided below. The commenter's opposition to the project is noted for the decisionmakers. The commenter may also refer to responses to Agency Letter 10 (NID), Group Letter 28 (Wells Coalition), and Group Letters 7 and 8 (CEA).

### **Response to Comment Ind 504-2**

The commenter provides a summary of various comments submitted by Community Environmental Advocates (CEA). The commenter is referred to Response to Comments Grp 7-68, 7-64, 7-65, 7-25, and 7-91.

### **Response to Comment Ind 504-3**

The commenter states that DEIR's groundwater monitoring is inadequate. The commenter also states that the DEIR attempts to defer an assessment of impacts to groundwater but does not state how the DEIR defers mitigation in this regard. The commenter also states the DEIR proposes an inadequate number of monitoring wells. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

### **Response to Comment Ind 504-4**

The commenter states that the DEIR understates the number of groundwater wells potentially impacted by the project because of the extent of the mineral rights boundary. The commenter states that the DEIR's groundwater mitigation measures are inadequate for a number of reasons. Regarding the area covered by the mineral rights boundaries, the commenter is referred to Master Response 7 - Location of Future Mining Areas. Regarding the adequacy of the groundwater mitigation measures, the commenter is referred to Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. The commenter also states that the impacts to groundwater wells will reduce property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts. The commenter is also referred to responses to Nevada Irrigation District Letter 10 of the Final EIR.

### **Response to Comment Ind 504-5**

The commenter states that the proposed discharge to South Fork Wolf Creek would result in increased water temperature, increased water volume and toxic heavy metals and states the DEIR did not adequately analyze these impacts. Specifically, the commenter states that community water sampling data contradicts the data in the DEIR but provides no evidence of this claim. The commenter is also referred to Master Response 32 - Temperature of Mine Water Discharge, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 8 - Mine Waste Characterization.

### **Response to Comment Ind 504-6**

The commenter states that the County should not consider approving this project in light of the drought and climate change more broadly. The commenter is referred to Master Response 16 -





Drought and Climate Change. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.



Individual Letter 505

Dist 3

RECEIVED

MAR 03 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Please fill out and send back to us your support for the Idaho-Maryland Mine

**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) LOW V. JOHNSON  
Address 701 W. McKnight Way  
Phone Suite B 293  
Email Address GRASS VALLEY CA 95949

*DO NOT USE*  
*PLEASE DO NOT REPLY TO THIS LETTER*  
*NO*  
*NO*  
*NO*  
*NO*

Ind 505-1

*I oppose this mine project. Please vote Against it!!*  
*Low V. Johnson*  
*3-26-22*



## **INDIVIDUAL LETTER 505: LOU JOHNSON**

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### **Response to Comment Ind 505-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 506**



January 29, 2021

Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 94959-8617

Dear Mr. Kelley:

**Ind 506-1**

I am writing in support of the proposal by Rise Grass Valley to re-open the Idaho-Maryland Mine in Grass Valley and to rehabilitate the Centennial area site for future use.

This project will yield numerous economic benefits for the local community such as new jobs and contract opportunities for small businesses. The region is in desperate need for new jobs, and the \$38 million in annual new payroll is a major boost for the region.

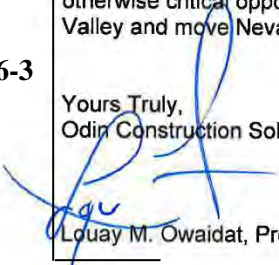
**Ind 506-2**

However, one of the lesser discussed aspects of the project that will prove to be a major community asset is the rehabilitation of the Centennial site for use of future businesses. The Rise plan to clean up the site is an enormous community benefit to Grass Valley and Nevada County, and they should be praised for their efforts to turn this site into a safe, usable area. When rehabilitated, the site will be transformed into a vital new area for industrial growth. Nevada County has a serious shortage of industrial space at present, and that makes it more difficult for local businesses to operate locally. Adding 31 acres of new industrial land potentially eliminates that problem and opens up new possibilities for the county.

**Ind 506-3**

As a construction business owner that operates in Nevada County, I can tell you that it is incredibly important to address the issue of opening up areas for potential new growth, otherwise critical opportunities to protect local jobs will be lost. I urge you to support Rise Grass Valley and move Nevada County in the direction of strong economic growth.

Yours Truly,  
Odin Construction Solutions, Inc.

  
Louay M. Owaidat, President and CEO

4740 Rocklin Road, Rocklin, CA 95677 | 916.251.5500 | [odinconstruction.com](http://odinconstruction.com)



## **INDIVIDUAL LETTER 506: LOUAY OWAI DAT**

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### **Response to Comment Ind 506-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 506-2**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 506-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 507**

**From:** Louis Jones <louisbjones@sbcglobal.net>  
**Sent:** Monday, April 4, 2022 5:02 PM  
**To:** Idaho MMEIR  
**Subject:** Please count me as a "No."

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To Whom It May Concern:

**Ind 507-1**

With regard to the Idaho-Maryland mine project, I worry about the unforeseeable consequences of de-watering. The West is a more fragile ecosystem than most realize, and especially as the century to come looks like it will be harder on the water table, I worry about hydrological issues.

**Ind 507-2**

However, the more important misgiving about the mine is its financial structure and its business flim-flam. RiseGold isn't well capitalized, and in the end it offers nothing to this community. The better-paid jobs will go to specialists, probably brought in from elsewhere, and maybe for a year our local folks will get employment — but on the whole, it seems like little more than a source of noise and dust.

Thank you — Louis Jones



## **INDIVIDUAL LETTER 507: LOUIS JONES**

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### **Response to Comment Ind 507-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see the discussions and analyses in Chapter 4.8, Hydrology and Water Quality, of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 507-2**

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 508**

**From:** Louis T. Quaintance <bodyart@lmi.net>  
**Sent:** Monday, April 4, 2022 10:04 AM  
**To:** Idaho MMEIR  
**Subject:** DEIR comments

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To: Nevada County Planning Commission  
Attn: Matt Kelley, Senior Planner  
950 Maidu Avenue  
Nevada City, CA 95959

Planning Commissioners and Staff

**Ind 508-1**

I am a resident of Nevada County, living uncomfortably close to the mineral rights boundary of the proposed Idaho-Maryland Mine Project. After attending the Planning Commission meeting on March 24, 2022, I am convinced that the Draft EIR of this project does not describe, or present adequate mitigations for, the mine's impacts on the quality of life here in Western Nevada County.

**Ind 508-2**

As a bicyclist and visual artist, the conditions along East Bennett, Greenhorn, Brunswick, Whispering Pines and Idaho-Maryland roads will become unbearable due to:  
Construction of the pipeline along East Bennett Road  
Heavy truck traffic with noxious exhaust fumes and potentially toxic dust  
Unsightly development of mine structures and of fill piles up to 7 stories high which will destroy the "aesthetics" of the area.  
Significant impacts on the South Fork of Wolf Creek and its associated watershed, and on Empire Mine State Historic Park.

**Ind 508-3**

Air quality will be significantly affected by additional heavy traffic along local roads, and by mine construction and operations at the Centennial and Brunswick sites.

**Ind 508-4**

Additional noise will severely impact the areas surrounding the mine:  
New truck traffic of 100 round trips a day, 16 hours a day, 7 days a week.  
Constant construction for the first year or more.  
Grading, rock crushing/compacting, and excavating operations.  
Underground blasting and drilling.

**Ind 508-5**

Property values in my neighborhood will plummet due to the mine's significant impacts on quality of life here: traffic, noise, poor air quality, toxic hazardous waste and dust, the unsightly processing plant and fill piles.

**Ind 508-6**

In addition to comments of speakers at the meeting, CEA Community Environmental Advocates, has written an extensive list of comments on behalf of many concerned Nevada County community groups.  
I urge that all these comments be answered, and corrections made to the DEIR.



**Ind 508-7**

Rezoning is required in order to get the mining operation approved. raising the allowable limits on a variety of measures, including noise and traffic. Do not allow rezoning. Keep allowable limits to acceptable levels.

In conclusion, the presence of the proposed Idaho-Maryland Mine will make life here literally unlivable, and will consequently destroy our way of life.

Sincerely,  
Louis Quaintance  
10777 Banner Mine Way  
Nevada City, CA 95959  
email: bodyart@lmi.net



## **INDIVIDUAL LETTER 508: LOUIS QUAINANCE**

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### **Response to Comment Ind 508-1**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 508-2**

Traffic, including traffic during construction of the pipeline in East Bennett Road, is addressed in Chapter 4.12, Transportation, of the DEIR. Air quality, including from truck traffic, is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Please see Master Response 12 – Chemical Dust Stabilizers. Aesthetics is addressed in Chapter 4.1, Aesthetics, of the DEIR. Please see Master Response 35 – Discharge to South Fork Wolf Creek. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 508-3**

Air quality is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 508-4**

Noise is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 508-5**

The comment does not address the adequacy of the DEIR. Please see Master Response 2.

### **Response to Comment Ind 508-6**

The comment refers to comments made by CEA. Please see responses to Group Letter 6, 7, and 8.

### **Response to Comment Ind 508-7**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 509**

**From:** [Louisa Suta](#)  
**To:** [hcdofsupervisors](#)  
**Subject:** Please say NO to Rise Gold  
**Date:** Sunday, February 20, 2022 8:37:40 PM

Dist 1

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**Ind 509-1**

Hello,  
Please take care of our community and not allow Rise Gold to open. Rise Gold has left a trail of grotesque negligence in Canada. Why would we open another mine before the damage from the last mine is cleaned up?

**Ind 509-2**

Also Rise Gold sent out brochures with postcards to send back in support and I sent that postcard back to them contesting their inaccurate science. It was just brought to my attention that they will count all returned postcards as a sign of support so please know many people also did this so their returned postcards do not reflect this community's opinion.

Thank you for not allowing a dangerous mine into our lives.

Louisa Suta  
10406 N Bloomfield Rd, Nevada City, CA 95959



## **INDIVIDUAL LETTER 509: LOUISA SUTA**

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### **Response to Comment Ind 509-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 509-2**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 510

From:  
Louise Jackson  
603 W. Broad St.  
Nevada City, CA 95959

March 31, 2022

To:  
Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959  
[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

Re: Draft Environmental Impact Report (DEIR) on the Idaho-Maryland Mine Project

Dear Mr. Kelley,  
Thank you for the opportunity to comment on the DEIR for the Idaho-Maryland Mine Project.

Ind 510-1

I have major concerns about the DEIR's inadequate analysis of toxic elements, and its lack of a detailed scientific approach for sampling and testing rock, soils, and sediments for toxics such as asbestos and arsenic. My comments are relevant to the categories of Air Quality, Hazards and Hazardous Materials, and Geology, Soils, Mineral Resources.

Ind 510-2

Asbestos in rock and tailings:  
Airborne asbestos particles may represent a significant cancer risk to mine workers and the population of Grass Valley. Yet sampling and analysis of asbestos was conducted in a meager and cursory way in the DEIR. A very small number of rock samples was tested as shown in the Asbestos Sampling Memo<sup>1</sup> and the Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan<sup>2</sup>. Moreover, the sampling strategy did not use a systematic approach, and did not follow a scientific design scheme. There was no sampling grid, nor was there a spatially explicit sampling design that could designate areas of critical concern for exposure and public health.

Ind 510-3

Only 40 rock core samples were analyzed for asbestos in the entire mining area<sup>3</sup>. These cores were apparently chosen from a set of exploratory cores for mining purposes, not for the intentional purpose of systematically sampling the distribution and concentration of asbestos for analyzing risks of exposure.

Ind 510-4

Asbestos was present in more than one-third of the cores, based on analysis using Transmission Electron Microscopy (TEM). Asbestos was discovered in all of the rock types, in varying concentrations. This is quite a high frequency from the point of view of human health, since it means that precautions for exposure must be taken very seriously, both in underground mining and in the rock for engineered fill.

<sup>1</sup> Richard Lippoth, Idaho-Maryland Mine Project Asbestos Sampling Memo. June 16, 2020. Vergence Geo Services Inc. Reno, NV. (<https://www.mynevadacounty.com/DocumentCenter/View/34999/Asbestos-Sampling-Memo---ADDED-6262020>).

<sup>2</sup> Idaho-Maryland Mine Project Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan Rise Grass Valley Inc. November 2021. (<https://www.mynevadacounty.com/DocumentCenter/View/41621/Appendix-E2-ASUR-Plan>)

<sup>3</sup> APPENDIX C IDAHO-MARYLAND EXPLORATION ASBESTOS SAMPLING of the ASUR Plan (<https://www.mynevadacounty.com/DocumentCenter/View/41621/Appendix-E2-ASUR-Plan>).



- ↑
- From the entire Centennial Industrial Site, only two samples were taken from the historic tailings. Asbestos was detected in one these samples, reinforcing the need for a more complete survey of the potential asbestos contamination in this 56-acre area.
- Ind 510-5** It should be noted that the data on asbestos in the DEIR are not up-to-date with the results of the ASUR Plan in Appendix E.2. For example, this statement is from page 4.3-80 of the DEIR: *"naturally-occurring asbestos is not known to outcrop at the surface of the Brunswick Industrial Site or Centennial Industrial Site."* Yet asbestos does occur based on the results described in the paragraph above. This is another indication of the need for a complete and robust documentation for the asbestos risks in the project.
- Ind 510-6** While an Asbestos Mitigation Plan will be prepared by Rise Gold, actual implementation would require extremely careful attention at all times during the 80 years of mining. Such an example is that *"All visible track-out material (from vehicles leaving the work site) must be removed from all public roads at least once per day using wet sweeping or a HEPA-filter-equipped vacuum device"* (page 2-17 of the DEIR). If such safety procedures were overlooked, even temporarily, partially, or inadvertently, exposure would increase, especially given the apparently high frequency of asbestos in rock.
- Ind 510-7** In the ASUR plan mentioned above, asbestos analysis of air samples will be reported as transmission electron microscopy (TEM) asbestos structures per cubic centimeter (s/cc). It is difficult to imagine how this will be performed across the mining and fill sites in a valid manner, given the current inability to even produce a sampling plan that adequately portrays the distribution of asbestos hazards in rock.
- Ind 510-8** Over 80 years, a huge volume of rock will be processed by Rise Gold (1000 tons per day). There are many sources of asbestos emissions as rock gets blasted, crushed, and transported around the mining area. Since aerial transport and runoff can carry asbestos off site as well, more attention must be placed on asbestos risk analysis including the larger area surrounding the mine. The plan in Appendix E.2<sup>4</sup> has inadequate detail on mitigation measures and sampling, and it is especially weak on spatially explicit recommendations.
- Ind 510-9** The public deserves a robust study and analysis of the risks of asbestos exposure and its health concerns for future generations. Please require that the asbestos sampling approach and protocols of the DEIR be updated to reflect the entire mining area and the huge amount of rock that will be removed during the 80-year duration of the project; re-analyze the impacts of asbestos exposure for the project and recirculate the DEIR.
- Ind 510-10** Arsenic at the mine site and in Wolf Creek drainage basin:  
Arsenic is a naturally occurring element that can cause serious effects on neurologic, respiratory, and gastrointestinal systems. It is also a carcinogen. My comments will focus on the inadequacy of the DEIR's analysis of the movement of arsenic in the Wolf Creek Basin, and thus on the potential exposure for people and wildlife in the area.
- The DEIR recognizes arsenic as a serious pollutant and concludes that elevated arsenic in the southeastern paved area of the mine creates a significant hazard to the public and the environment
- ↓

<sup>4</sup> Idaho-Maryland Mine Project Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan Rise Grass Valley Inc. November 2021. ([https://www.mynevadacounty.com/DocumentCenter/View/41621/Appendix-E2\\_ASUR-Plan](https://www.mynevadacounty.com/DocumentCenter/View/41621/Appendix-E2_ASUR-Plan))





(Chapter 4.7 – Hazards and Hazardous Materials Page 4.7-35). Arsenic occurs above its maximum contaminant level (MCL) in New Brunswick drain samples (Chapter 4.8 – Hydrology and Water Quality Page 4.8-21).

To dewater the mine, Rise Gold will pump millions of gallons every day for 6 months, and dewatering will continue for 80 years. This water will inundate stream corridors, and the scouring of creek banks will move sediment downstream toward Grass Valley. The DEIR does not adequately discuss the already existing arsenic contamination in the Wolf Creek area that results from past acid-mine drainage and mining contamination<sup>5</sup>. I have found no mention of a 2009 study of soil samples by Wolf Creek Community Alliance showing high concentrations of arsenic in some places. These data indicate the need for a robust study on existing arsenic contamination along the waterways affected by dewatering. If dewatering mobilizes existing arsenic into waterways, it can be transported downstream toward Grass Valley where people risk exposure from water and sediment near their homes and recreational areas.

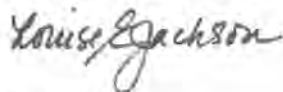
Ind 510-11

While the DEIR acknowledges the potential for acid mine drainage impacts on waterways, it also must address the impact of its dewatering on exposure to arsenic from movement of sediment off-site. A robust hydrologic study is needed to understand how dewatering the mine may increase the risk of exposure to arsenic as well as other toxic minerals such as chromium and lead that also are in existing sediments. This will require sampling of soils and sediments along the stream courses in a systematic approach that considers topography and mining history, along with hydrologic modeling to examine the fate of these toxics in the urban landscape and beyond. Another big concern is movement of arsenic-containing sediment when dewatering occurs during large winter storm events. These 'atmospheric rivers' are expected to become more frequent due to climate change<sup>6</sup>.

The people and wildlife in the Grass Valley area should not be subjected to an increase in arsenic due to the Rise Gold mine, and they deserve thorough analysis of the effects of mining on its toxicity. Please require that a watershed sampling approach for arsenic and hydrologic modeling be included in an updated version for the DEIR; re-analyze how the project will directly or indirectly increase exposure to arsenic causing potentially significant impacts on the environment and public health.

Ind 510-12

Thank you for your consideration,



Louise Jackson  
Emerita Professor and Cooperative Extension Specialist  
Department of Land, Air and Water Resources  
University of California Davis

Attachment: BJ Schmitt, Wolf Creek Community Alliance 2009 Soil Sampling Report. January 26, 2010. ([https://www.wolfcreekalliance.org/documents/WCCA\\_SoilToxinResults2009.pdf](https://www.wolfcreekalliance.org/documents/WCCA_SoilToxinResults2009.pdf))

<sup>5</sup> BJ Schmitt, Wolf Creek Community Alliance 2009 Soil Sampling Report. January 26, 2010. ([https://www.wolfcreekalliance.org/documents/WCCA\\_SoilToxinResults2009.pdf](https://www.wolfcreekalliance.org/documents/WCCA_SoilToxinResults2009.pdf))

<sup>6</sup> D.L. Swain, B. Langenbrunner, J.D. Neelin and A. Hall. 2018. Increasing precipitation volatility in twenty-first-century California. Nature Climate Change 8:427-433. (<https://doi.org/10.1038/s41558-018-0140-y>)





**Wolf Creek Community Alliance  
2009 Soil Sampling Report  
By BJ Schmitt  
January 26, 2010**

**Introduction:**

Wolf Creek watershed is located in one of the most heavily gold-mined areas of California. Historical mining has left a toxic legacy in the soils and water of Nevada County. Wolf Creek Community Alliance received a grant from the Rose Foundation in June 2008 to start a preliminary mining-toxin survey in our watershed.

**Soil Samples:**

WCCA collected soil samples in April 2009 from targeted locations where there are visual or other indicators (e.g. yellow-boy) of possible acid-mine drainage and potential mining contamination. Figures 1 through 4 show some of the sites we tested. Figure 5 is a map that locates the sampling sites in the Wolf Creek watershed. A team collected soil samples from 21 sites in the watershed, mostly in or near Grass Valley. We sent the screened soil samples to ALS-Chemex labs in Reno, Nevada, where they were tested for levels of 33 elements in their ME-ICP 61 panel, as well as for Mercury (Hg) in their Hg-CV41 test.

**Toxicity Thresholds:**

Human health and environmental thresholds were researched, and both EPA and State of California values are included in this report.

- The “Friends of Deer Creek” (FoDC) thresholds are primarily taken from the California Human Health Screening Levels (CHHSL), with the exception of cobalt and arsenic.
- The cobalt decision rule is from EPA’s Preliminary Remediation Goal (PRG) for Residential Soil.
- Arsenic toxicity is related to bioavailability, similar to mercury. California’s Department of Toxic Substances Control (DTSC) is due to publish a report on the bioavailability of arsenic in various foothill soils. It will be more appropriate to determine thresholds for arsenic after the publication of the DTSC report. According to FoDC, background levels in our area are 20 to 30 ppm, higher than the screening levels, and the human health threshold for this study is 22 ppm.
- Thresholds listed in this report under “EPA review” include thresholds for health of plants, soil invertebrates, birds (avian herbivores, insectivores and carnivores) and mammalian herbivores, insectivores and carnivores. These values are taken from the federal EPA Ecological Soil Screening Levels (SSL) website ([www.epa.gov/exotox/ecossll](http://www.epa.gov/exotox/ecossll)). This site summarizes values from volumes of research project results.

Ind 510-13



- A few screening levels are also reported from Lubomir Simeonov's "Soil Chemical Pollution", which are all reported at pH 6.

**Results:**

Appendix 1 delineates soil levels for 14 of the 34 elements for which we tested. Results for two elements (Aluminum (Al) and Iron (Fe)) are not included because soil levels are not correlated with toxicity. WCCA has no toxicity screening level information for a further 18 of the elements for which we have results. Results were included in the ALS-Chemex panel, but are not studied in this report. The elements that are not included are bismuth (Bi), calcium (Ca), gallium (Ga), potassium (K), lanthanum (La), magnesium (Mg), molybdenum (Mo), sodium (Na), phosphorous (P), sulphur (S), antimony (Sb), scandium (Sc), strontium (Sr) titanium (Ti), thorium (Th), thallium (Tl), uranium (U) and tungsten(W).

Soil levels for the 14 elements for which WCCA has toxicity information are reported with various thresholds. The human health threshold is perhaps the most widely accepted, although many of the ecological endpoints are much lower (plant and animal health information). Avian insectivores often appear to be the most sensitive, although the studies are somewhat controversial.

**Toxicity by element:**

WCCA studied the soil toxicity of 14 elements, from soil samples at targeted sites in and around Grass Valley, California. From a human health perspective, i.e. using the FoDC screening thresholds, our data points to three elements of primary concern: arsenic, chromium and lead. Tests for ten of the remaining 11 element resulted in levels of concern according to various criteria, as described below. Charts 1 through 14 delineate the results.

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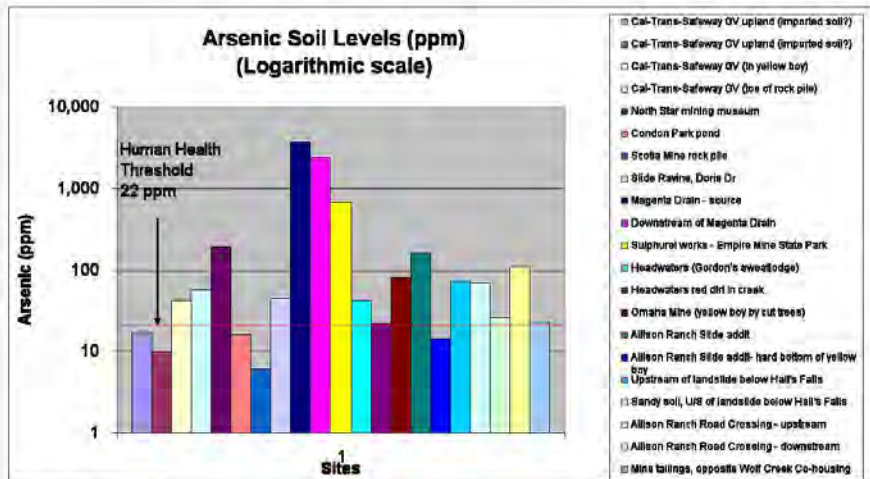


Chart 1: Arsenic



Arsenic levels in the soil exceed the human health threshold (22 ppm) at 16 of the 21 sites (76%). At two (2) sites the levels were over 100 times the threshold (2,360 and 3,670 ppm). "Environmental exposure to well water containing inorganic arsenic can result in skin hyperpigmentation or an eczematous dermatitis. Arsenic is listed as a presumed carcinogenic substance based on the increased prevalence of lung and skin cancer observed in human populations with multiple exposures (primarily through industrial inhalation)." (<http://emedicine.medscape.com>).

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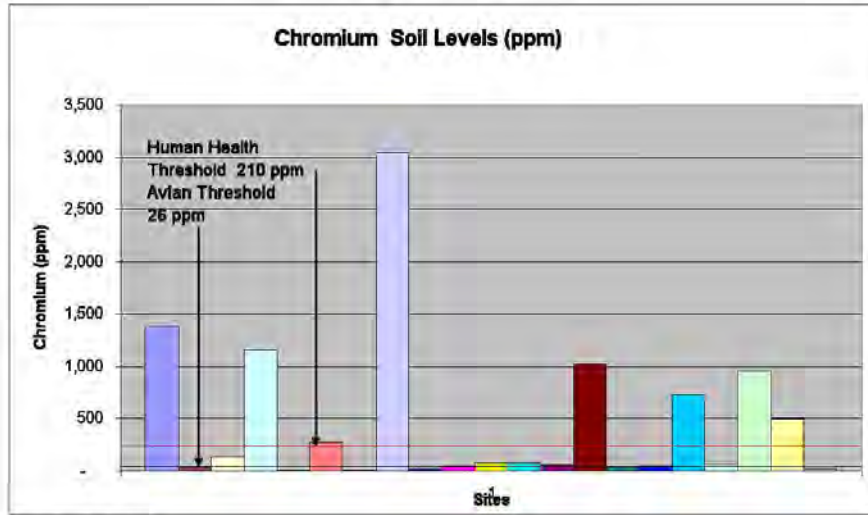


Chart 2: Chromium

Chromium levels exceeded the human health threshold (210 ppm) at eight (8) of the sites (38%). Four of these sites had levels over 1,000 ppm. Levels at an additional 9 (nine) exceeded the lowest (avian) threshold (26 ppm). The Cr(III) threshold ranges from 26 to 780 ppm (avian), and from 34 to 380 ppm (mammals). The Cr(VI) mammalian threshold ranges from 130 to 1,400 ppm. Cr(VI) degrades to Cr(III). Typical background levels in the Western US are 50 ppm. Our tests did not distinguish between Cr(III) and Cr(VI). Cr(III) is an essential dietary nutrient. Its deficiency in the body has been associated with diabetes, infertility, and cardiovascular disease. Cr(VI) is carcinogenic. Cr(VI) degrades to Cr(III).

Lead levels in the soil exceed the human health threshold (150 ppm) at one (1) of the 21 sites. An additional 16 exceeded the lowest (avian insectivore) level (11 ppm), or 17 of 21 (81%) exceeding the most sensitive threshold. "Lead content in soil may come from lead paint, gasoline or pesticides, landfills, or from industries such as foundries or smelters. Lead in soils raises concerns about the safety of urban agriculture. Poisoning by organic lead compounds has symptoms predominantly in the central nervous system, such as insomnia, delirium, cognitive deficits, tremors, hallucinations, and convulsions." (Wikipedia).





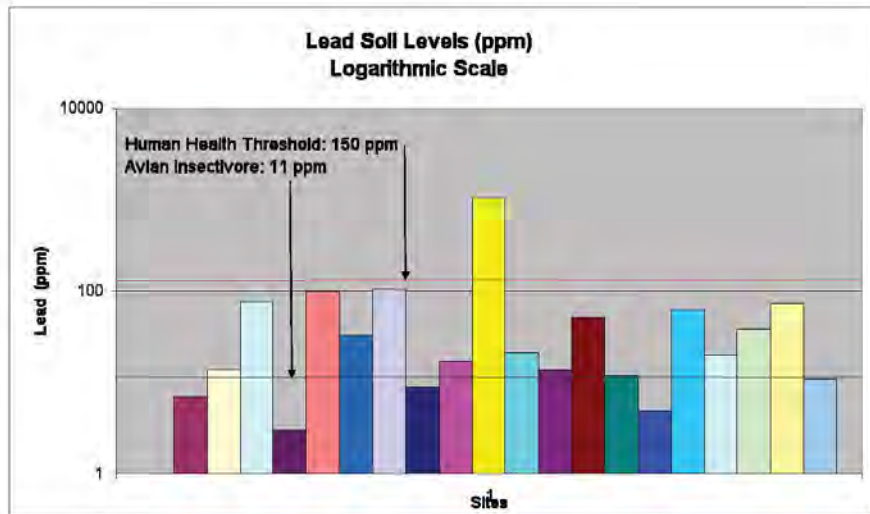


Chart 3: Lead

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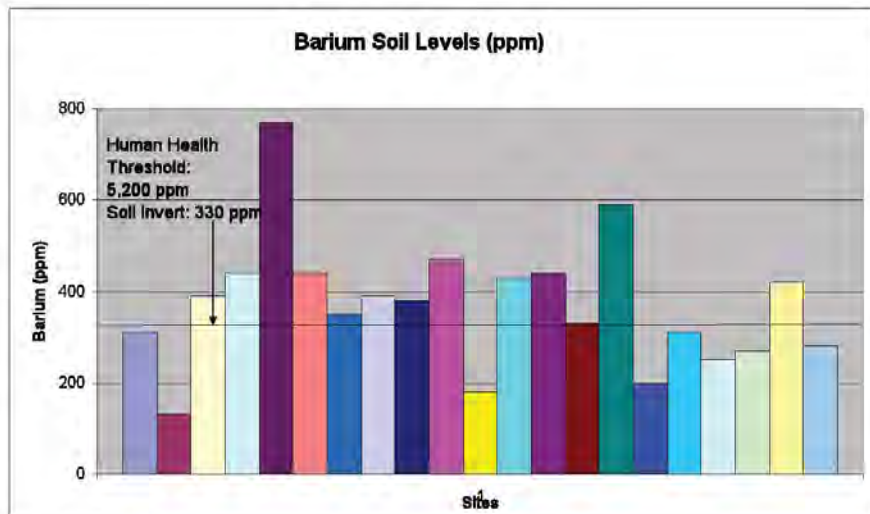


Chart 4: Barium

Barium levels were all well below the 5,200 ppm human health threshold. The most sensitive threshold of 330 ppm for soil invertebrates was exceeded in 13 of 21 samples (62%). It is of interest to note that the only other threshold found for this report is 9,100 ppm for mammalian carnivores.



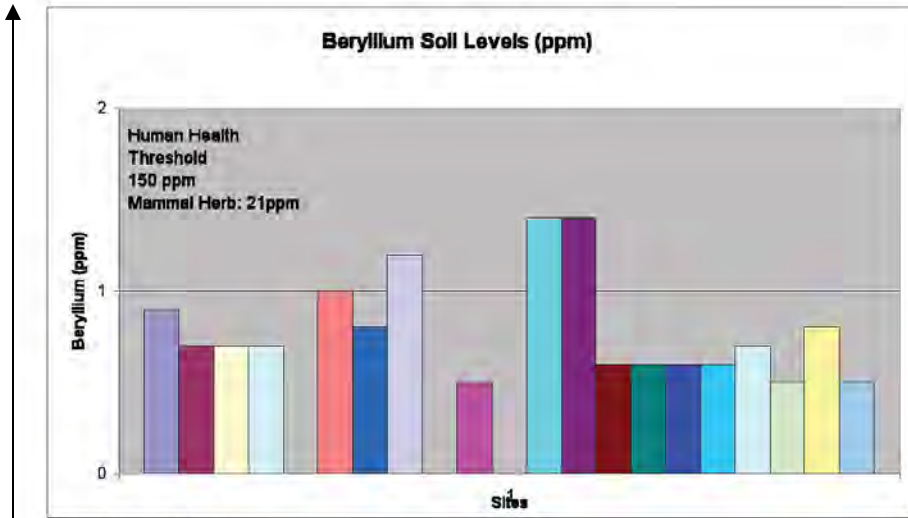


Chart 5: Beryllium

The beryllium human health threshold is 150 ppm. This was not exceeded. The mammalian herbivore threshold of 21 ppm is the lowest in this study. It was also not exceeded. This was the only element for which levels did not exceed a known threshold.

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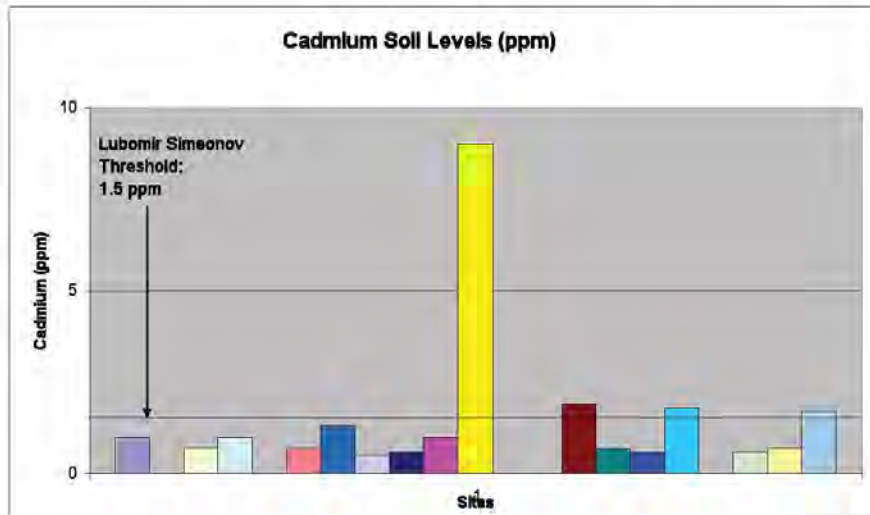


Chart 6: Cadmium

The only Cadmium threshold (2.1 ppm) came from Lubomir Simeonov. This was exceeded in four samples (19%).





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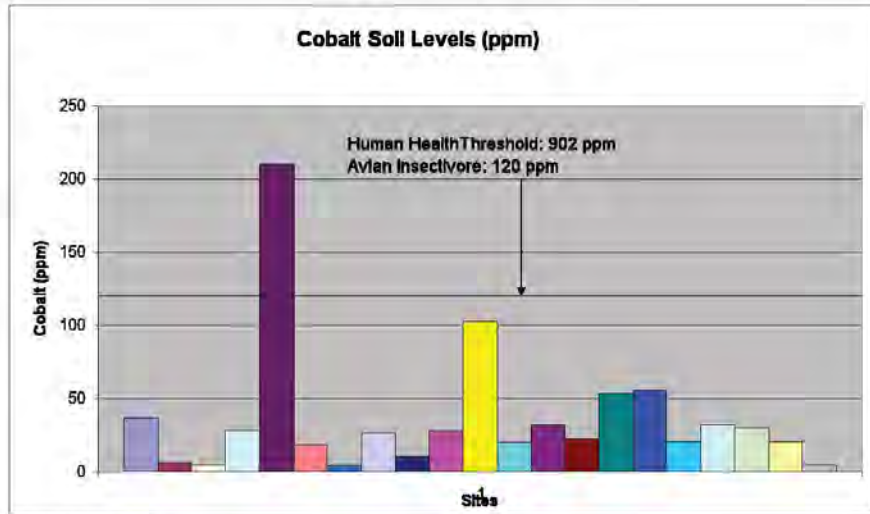


Chart 7: Cobalt

Cobalt levels in the soil did not exceed the human health threshold of 902 ppm. Levels at 1 site exceeded the most sensitive (avian insectivore) threshold of 120 ppm. Typical background levels in the Western US are 10 ppm.

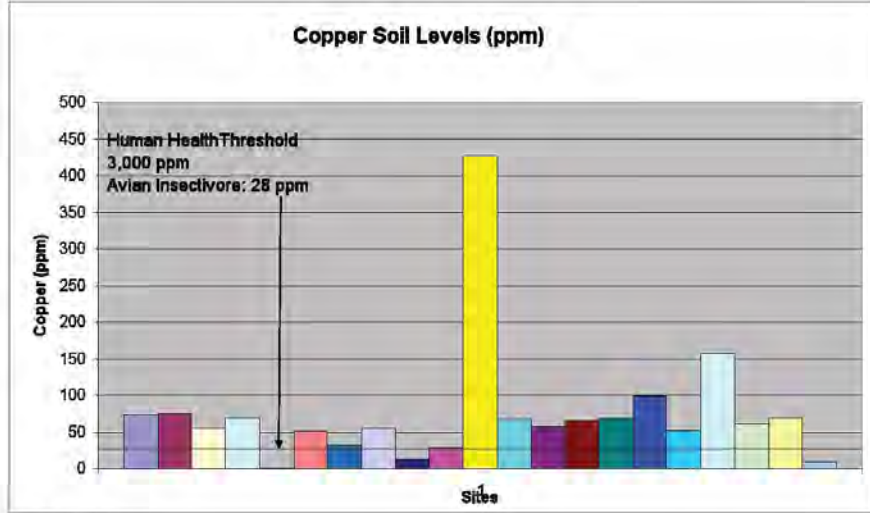


Chart 8: Copper

Copper levels in the soil did not exceed the human health threshold of 3,000 ppm. Levels at 18 sites (86%) exceeded the lowest (avian insectivore) threshold of 28 ppm.



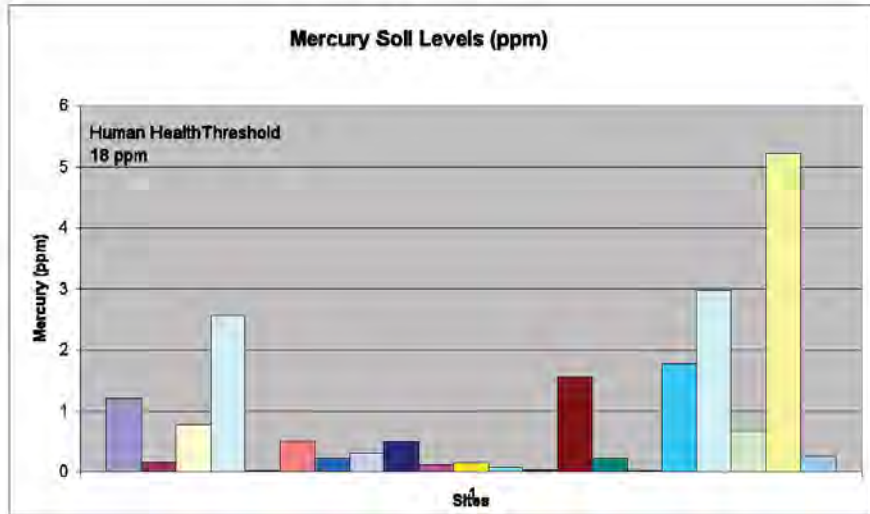


Chart 9: Mercury

Mercury levels in the soil did not exceed the human health threshold of 18 ppm. Levels at 6 sites (29%) exceeded the Lubomir Simeonov threshold of 1 ppm. The toxicity of mercury depends on the bioavailability.

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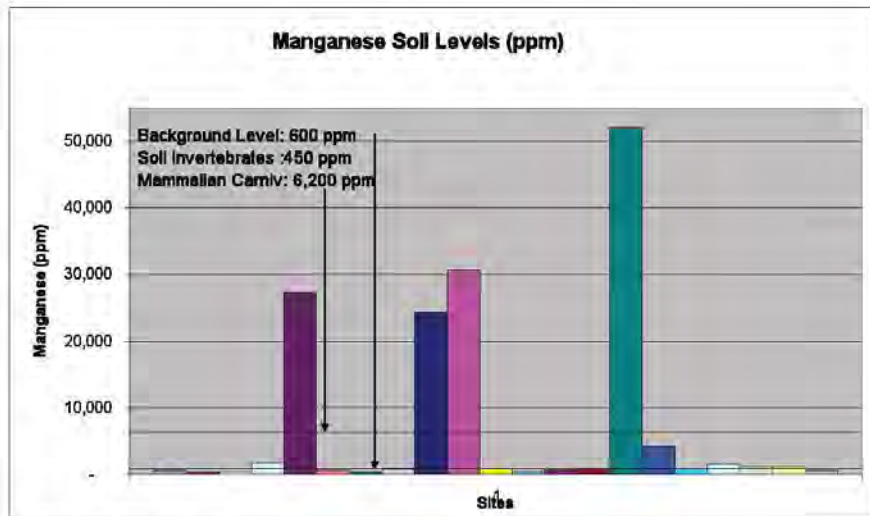


Chart 10: Manganese

This report does not contain a human health threshold for Manganese. The threshold for mammalian carnivores is 6,200 ppm. Soil levels exceeded the background level of 600



ppm at 15 sites (71%), substantially in four cases. The levels at the remaining six sites were very close to the listed background concentration. “Manganese is a very common compound that can be found everywhere on earth. It is necessary for humans to survive, but also toxic when too high concentrations are present in a human body.” (<http://www.lenntech.com/periodic/elements/mn.htm#ixzz0dl3YzU05>). “Manganese toxicity may result in neurologic problems for people who inhale manganese dust. The symptoms generally appear slowly. Toxicity can result in a permanent neurological disorder with symptoms including tremors, difficulty walking, and facial muscle spasms. This is sometimes preceded by symptoms such as irritability, aggressiveness, and hallucinations.” Linus Pauling Institute.

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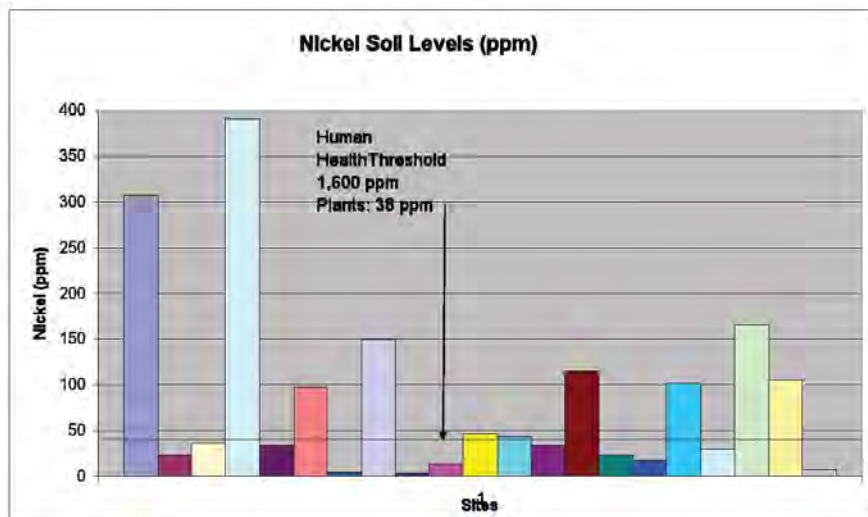


Chart 11: Nickel

Nickel levels in the soil did not exceed, nor even approach the human health threshold of 1,600 ppm. Levels at 10 sites (48%) exceeded the plant threshold of 38 ppm.

This report does not contain a human health threshold for silver. Silver levels in the soil did not exceed, nor even approach the mammalian threshold of 990 ppm. Levels at 1 site (5%) exceeded the avian insectivore threshold of 4.2 ppm.

“Ingestion, inhalation, or dermal absorption of silver may cause argyria, the most common indicator of long-term exposure to silver or silver compounds in humans. Argyria is a permanent discoloration of the skin that is not toxic but is considered cosmetically disfiguring.” <http://cira.ornl.gov/documents/SILVER.pdf>



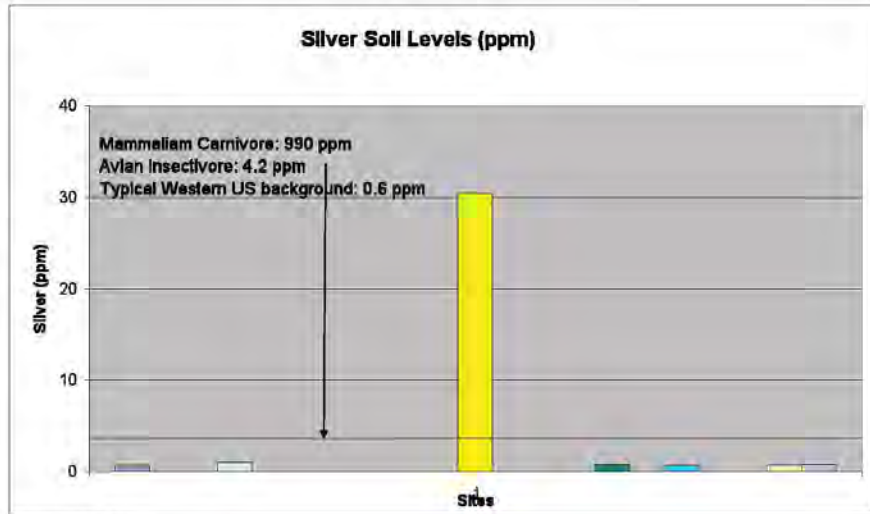


Chart 12: Silver

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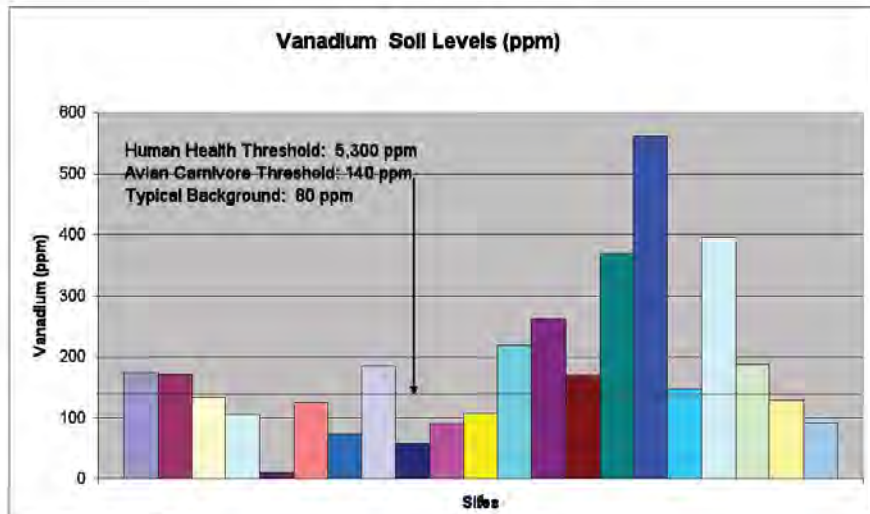


Chart 13: Vanadium

Vanadium levels in the soil did not exceed the human health threshold of 5,300 ppm. The most sensitive levels were for avian herbivores (13 ppm) and avian insectivores (7.8 ppm). These thresholds were below typical Western US levels of 80 ppm, and were therefore not scrutinized. The next most sensitive threshold is for avian carnivores, at 140 ppm. This level was exceeded at ten sites (48%).





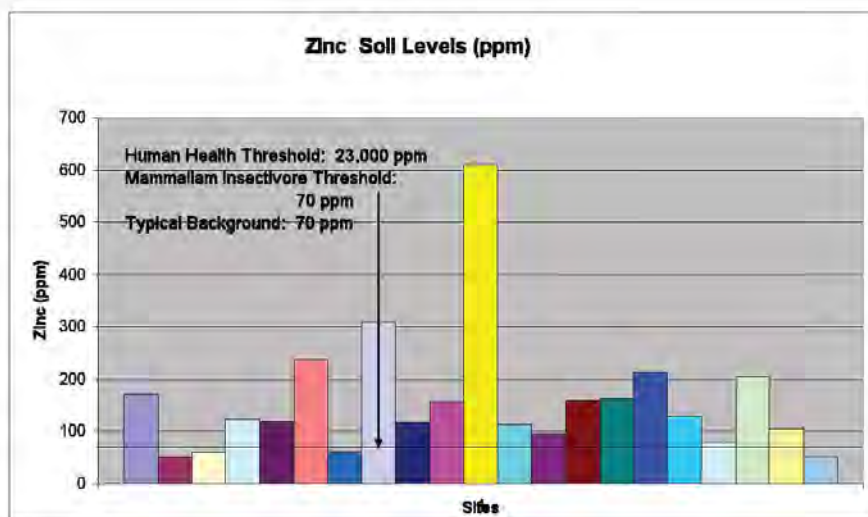


Chart 14: Zinc

Zinc levels in the soil did not exceed the human health threshold of 23,000 ppm. The most sensitive level is for avian insectivore (43 ppm) which is below typical Western US levels of 70 ppm, and was therefore not studied. Levels at 17 sites (81%) exceeded the next lowest (mammalian insectivore) threshold of 70 ppm.

**Toxicity by site:**

- Of the twenty-one soil test sites, eighteen sites had toxic levels of either arsenic and/or chromium above the human health threshold.
- One site had toxic levels of lead, exceeding the using the human health threshold.
- Just three sites tested below the human health thresholds for these three elements (Ar, Cr, Pb).
- All sites tested above the most sensitive toxic thresholds for between three and eight elements (in addition to arsenic, chromium and lead).

The least toxic samples are from the Cal-Trans site sampled next to the yellow-boy (#2), the Scotia Mine rock pile (#12) and the mine tailings opposite Wolf Creek co-housing (#21). The sites of most concern include the Cal-Trans site sampled at the toe of the rock pile (#4), two Magenta Drain sites (9 and 10), the Sulphuret Works at Empire Mine State Historic Park (#11), Omaha Mine (14), two sites upstream of the Allison Ranch slide addit (17 and 18) and the downstream Allison Ranch Road crossing site (20). The remaining nine sites are of concern, but not top priority at this time.

**Cal-Trans property behind Safeway Grocery Store in Grass Valley (samples 1 through 4):**

There is a small tributary with yellow substrate flowing into Wolf Creek from the Cal-Trans easement located across Wolf Creek from the Safeway store in downtown Grass Valley. We took four samples at this site, #1 upland as a background sample, #2 next to the yellow tributary, #3 in the yellow substrate of the tributary, and #4 upland in the toe of the large Cal-Trans rock pile. The yellow substrate material (#3) tested slightly high for arsenic (42 ppm) and slightly above thresholds for four other elements (Ba, Cr, Cu,

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Pb). The area just adjacent (#2) tested slightly high for just two elements (Cr, Cu), and is the site with the least toxic test results of all our 21 samples. The upland soil was very high in Chromium (1,380 ppm vs. 210 ppm human health threshold), as well as having slightly elevated levels of five elements (Cu, Hg, Ni, V, Zn). **Site #4, at the toe of the Caltrans rock pile tested to be the most toxic of the Caltrans sites, and one of the most toxic of all the sites we sampled.** There were elevated arsenic and chromium levels, as well as slightly toxic levels of seven other elements (Ba, Cu, Hg, Mn, Ni, Pb, Zn). Chromium and manganese levels were of particular concern. The only consistencies in this area were non-toxic levels of beryllium, cadmium and cobalt, and all four sites had toxic levels of chromium and copper.

North Star Mining Museum Grass Valley (sample 5):

Sample #5 tested high for arsenic (197 ppm) and manganese (27,300 ppm). It was also above toxic thresholds for three other elements (Ba, Co, Zn). This is one of the least toxic sites, although the arsenic and manganese levels are of particular concern.

Condon Park Pond (sample 6):

The Condon Park pond is one of the five sites that does not have toxic levels of arsenic that exceed the human health threshold of 22 ppm. It does have slightly toxic levels of Chromium (270 ppm), and levels above the most sensitive thresholds for five other elements (Ba, Cu, Ni, Pb, Zn).

Scotia Mine rock pile (sample 7):

Sample 7 is one of only three sites that does not have toxin levels that exceed the human health thresholds. It does have levels above the most sensitive thresholds for three elements (Ba, Cu, Pb). **This is one of the least toxic sites we sampled.**

Slide Ravine at Doris Drive (sample 8):

Sample 8 has arsenic and chromium levels that exceed the human health thresholds, the chromium level substantially. It also has levels that exceed the most sensitive thresholds for an additional seven elements (Ba, Cu, Mn, Ni, Pb, V, Zn). **This is one of the most toxic sites we sampled.**

Magenta Drain at the source (sample 9):

The Magenta Drain upstream site has the highest level of arsenic we found at 3,670 ppm. This greatly exceeds the human health threshold of 22 ppm. It also has elevated levels of Manganese at 27,300 ppm. While there is not a human health threshold listed for Manganese, the typical background level in the Western US is 600 ppm, and the threshold for mammalian carnivores is 6,200 ppm. This site has soil toxin levels above the most sensitive thresholds for two other elements (Ba, Zn). **This is a site of special concern due to the very high arsenic and manganese levels.**

Magenta Drain downstream from the source (sample 10):

The Magenta Drain downstream site has the second highest level of arsenic we found at 2,360 ppm. This greatly exceeds the human health threshold of 22 ppm. It also has elevated levels of manganese at 30,600 ppm. While there is not a human health threshold listed for manganese, the typical background level in the Western US is 600



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ppm, and the threshold for mammalian carnivores is 6,200 ppm. This site has soil toxin levels above the most sensitive thresholds for five other elements (Ba, Cr, Cu, Pb, Zn). **This is a site of special concern due to the high arsenic and manganese levels.**

**Empire Mine SHP Sulphuret Works (sample 11):**

Site 11 has high levels of lead (1,030 ppm). This greatly exceeds the human health threshold of 150 ppm. The Sulphuret Works has high arsenic levels (675 ppm) that exceed the human health threshold of 22 ppm. It is the only site that was tested that has elevated Silver levels, and it has the highest cadmium levels of all the sites we tested. While there is not a human health threshold listed for cadmium, no other site had soil levels above 2 ppm, and the Lubomir Simeonov threshold is 1.5 ppm. This site has soil toxin levels above the most sensitive thresholds for five other elements (Cr, Cu, Mn, Ni, Zn). **This is one of the most toxic sites we sampled.**

**Headwaters (Baker Property) (sample 12):**

This headwaters site had arsenic levels of 42 ppm, which exceed the human health threshold of 22 ppm. This site has soil toxin levels above the most sensitive thresholds for seven other elements (Ba, Cr, Cu, Ni, Pb, V, Zn). The levels are not extremely high, although there is concern about cumulative effects of so many different toxins.

**Headwaters – red dirt (sample 13):**

This headwaters site is very similar to sample 12 and had arsenic levels of 22 ppm, which matches the human health threshold. This site has soil toxin levels above the most sensitive thresholds for seven other elements (Ba, Cr, Cu, Ni, Pb, V, Zn). The levels are not extremely high, although there is concern about cumulative effects of so many different toxins.

**Omaha Mine (sample 14):**

Sample 14 has arsenic and chromium levels that exceed the human health thresholds, the Chromium level substantially. It also has levels that exceed the most sensitive thresholds for an additional eight elements (Ba, Cd, Cu, Hg, Mn, Ni, Pb, V, Zn). **This is one of the most toxic sites we sampled, based on the high levels of arsenic and chromium, and concern about cumulative effects of so many different toxins.**

**Allison Ranch Addit (samples 15 and 16):**

Just upstream of the Omaha mine is a small tributary that trickles into Wolf Creek out of an addit. This is at the landslide site on Allison Ranch Road. Two samples were taken, sample 15 in the “yellow-boy” and sample 16 below the yellow-boy in the hard substrate. Sample 15 tested high for arsenic (161 ppm) and the highest of all samples for manganese (52,100 ppm). It was also above the most sensitive toxic thresholds for six other elements (Ba, Cr, Cu, Pb, V, Zn). This site is of concern due to the cumulative effects of such a high number of different toxins, as well as the toxic arsenic and manganese levels. Sample 16 is one of the few sites that did not exceed the human health threshold for arsenic. Manganese levels are elevated (4,290 ppm), and levels are also above the most sensitive toxic thresholds for four other elements (Cr, Cu, V, Zn).

**Allison Ranch Road Upstream of Addit (sample 17):**

Two samples were taken upstream of the Allison Ranch Addit site in different types of soil. Sample 17 has arsenic and chromium levels that exceed the human health thresholds. It also has levels that exceed the most sensitive thresholds for an additional





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eight elements (Cd, Cu, Hg, Mn, Ni, Pb, V, Zn). **This is one of the most toxic sites we sampled, based on the high levels of arsenic and chromium, and concern about cumulative effects of so many different toxins.**

**Allison Ranch Road Upstream of Addit - Sandy Soil (sample 18):**

The second sample taken upstream of the addit site was taken in sandy soil. Sample 18 had arsenic levels of 68 ppm that exceed the human health threshold. It also had levels that exceed the most sensitive thresholds for an additional seven elements (Cr, Cu, Hg, Mn, Pb, V, Zn).

**Allison Ranch Road Crossing Upstream (sample 19):**

Sample 19 has arsenic and chromium levels that exceed the human health thresholds. It also has levels that exceed the most sensitive thresholds for an additional six elements (Cu, Mn, Ni, Pb, V, Zn). **This is one of the most toxic sites we sampled, based on the high levels of arsenic and chromium, and concern about cumulative effects of so many different toxins.**

**Allison Ranch Road Crossing Downstream (sample 20):**

Sample 20 has arsenic and chromium levels that exceed the human health thresholds. It also has levels that exceed the most sensitive thresholds for an additional seven elements (Ba, Cu, Hg, Mn, Ni, Pb, Zn). **This is one of the most toxic sites we sampled, based on the high levels of Arsenic and Chromium, and concern about cumulative effects of so many different toxins.**

**Mine Tailings opposite Wolf Creek Co-housing (sample 21):**

Sample #21 tested high for arsenic (23 ppm). This is very slightly above the human health threshold of 22 ppm. It was above toxicity thresholds for four other elements (Cd, Mn, Pb, Zn). **This is one of the least toxic sites we sampled.**

**Conclusions:**

WCCA is most concerned with soil toxicity from arsenic, chromium and lead. Soil levels of these three elements were found to exceed human health thresholds. All but three of the sampling sites had toxin levels for at least one element that exceeded human health thresholds. Ten of the twenty-one sites are designated of most concern, as detailed above, due to high levels of toxins, and/or concern about cumulative affects of many different toxins.

**Next Steps:**

Since preliminary testing reveals toxic conditions in the watershed, further testing is indicated. Comparison with background conditions in nearby locations would provide important information. Outreach to landowners regarding clean-up technologies and possible funding sources will be critical in repairing this damage to our watershed.

*Thank you to the Rose Foundation for their generous funding of this work.*





← Figure 1:  
“Yellow-Boy” at  
the Allison Ranch  
Road slide area.



Figure 2: →  
Magenta Drain

Ind 510-13



← Figure 3: North Star Mining  
Museum Tributary

Figure 4: →  
Omaha Mine area





Ind 510-13

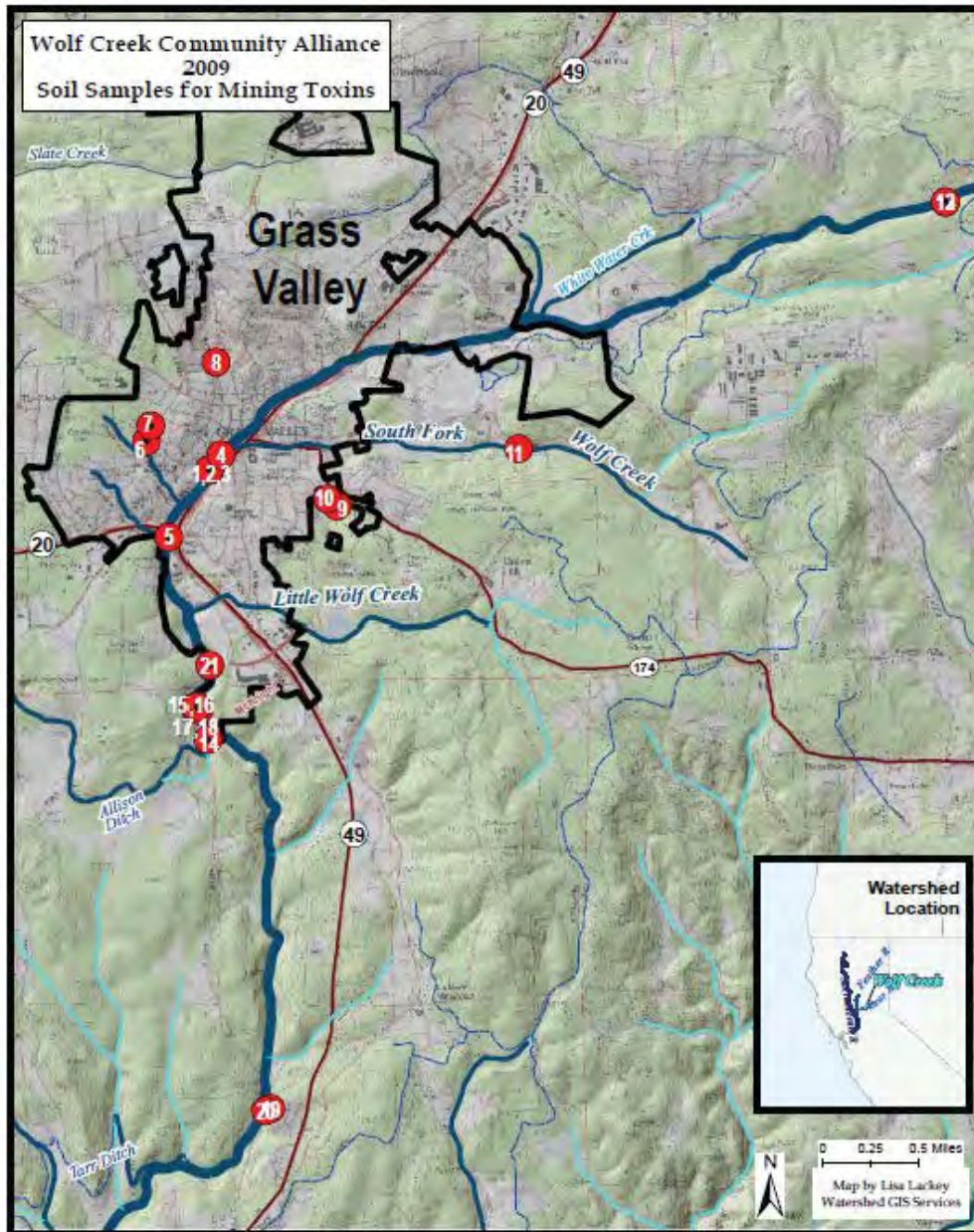


Figure 5: Map of Soil Test Sites





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## **INDIVIDUAL LETTER 510: LOUISE JACKSON**

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### **Response to Comment Ind 510-1**

This is an introductory comment. Responses to specific comments are provided below.

### **Response to Comment Ind 510-2**

Please see Master Response 23 - Adequacy of Asbestos Sampling.

### **Response to Comment Ind 510-3**

Please see Master Response 23 - Adequacy of Asbestos Sampling.

### **Response to Comment Ind 510-4**

Please see Master Response 23 - Adequacy of Asbestos Sampling, Master Response 9 - Historical Mine Waste at Centennial Site, and Master Response 22 - Conservatism of Asbestos Assumptions.

### **Response to Comment Ind 510-5**

An outcrop refers to an outcrop of bedrock. Historic tailings are not an outcropping of rock but rather the remaining material from historic mineral processing. Accordingly, the language cited by the commenter does not indicate an inconsistency.

### **Response to Comment Ind 510-6**

Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos. NSAQMD will have authority over implementation of the ADMP to ensure that Rise complies with the conditions and requirements of the ADMP and NSAQMD also has authority to bring an enforcement action in the event of non-compliance.

### **Response to Comment Ind 510-7**

Please see Master Response 23 - Adequacy of Asbestos Sampling, and Response to Comment Ind 510-6.

### **Response to Comment Ind 510-8**

Please see Response to Comment Ind 510-6, Master Response 23 - Adequacy of Asbestos Sampling, and Master Response 22 - Conservatism of Asbestos Assumptions.

### **Response to Comment Ind 510-9**

Please see Response to Comment Ind 510-8. The DEIR's analysis of asbestos exposure impacts was conducted in a conservative and thorough manner and the mitigation provided adequately



reduces this impact to a less than significant level. As such, recirculation of the DEIR based on asbestos impacts is not required.

### **Response to Comment Ind 510-10**

The commenter asserts that Wolf Creek is contaminated with arsenic from past mining contamination and cites a 2009 study conducted by Wolf Creek Community Alliance. This report is provided in Comment Ind 510-13. The commenter asserts that mine dewatering will scour creek banks and move sediment containing arsenic towards Grass Valley. However, a review of this study reveals that no samples in the 2009 study referenced by the commenter were from the bed or bank of South Fork Wolf Creek or Wolf Creek. Page 1 of the 2009 WCAA study describes the general methodology of the sampling for that study and states that samples were collected from “the Wolf Creek watershed” but does not state that the samples were drawn from the bed or bank of the streams. The description of each sampling site on pages 10 through 13 of the 2009 WCAA study discusses soil samples and samples from historic mine sites in the Wolf Creek watershed, but does not state that any samples were actually taken from the bed or bank of Wolf Creek or South Fork Wolf Creek. Figure 5 of the 2009 WCAA study is a map that roughly identifies sampling locations, and while Sampling Site 11 appears to be on South Fork Wolf Creek, the description for sample 11 is “Empire Mine State Historic Park Sulphuret Works” which is not located adjacent to or in the bed or bank of South Fork Wolf Creek<sup>4</sup>. Furthermore, the analysis of the DEIR has shown that mine water discharge to South Fork Wolf Creek will not cause substantial erosion or siltation. Please see Chapter 4.8 and Appendix K.1 of the DEIR and Master Response 36 - Flows in South Fork Wolf Creek.

### **Response to Comment Ind 510-11**

Please see Response to Comment Ind 510-10.

### **Response to Comment Ind 510-12**

Please see Response to Comment Ind 510-10.

### **Response to Comment Ind 510-13**

This comment reproduces a 2009 study conducted by Wolf Creek Community Alliance and does not address the adequacy of the DEIR. Comment noted.

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<sup>4</sup> [https://www.envirostor.dtsc.ca.gov/public/profile\\_report?global\\_id=29100019](https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=29100019)



Individual Letter 511

list 1

**DO NOT**  
**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$121,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

RECEIVED  
FEB 22 2022

Name(s) Louise E. Taylor NEVADA COUNTY  
Address 14121 Loma Rica Drive BOARD OF SUPERVISORS  
Grass Valley, CA 95945-9513  
Phone \_\_\_\_\_  
Email Address \_\_\_\_\_

Ind 511-1



## **INDIVIDUAL LETTER 511: LOUISE TAYLOR**

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### **Response to Comment Ind 511-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 512**

**From:** Luke Berliner <berliner.design@gmail.com>  
**Sent:** Monday, April 4, 2022 2:56 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** DEIR Comment - Opposed to the Mine

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**Ind 512-1**

Hello,

As someone who was born and raised in Nevada City and then returned as an adult I came back for the vibrant town and natural beauty our county offers.

The mine is our past and not our future and is directly in contrast to where I believe our community needs to head. I am much more in favor of environmental stewardship and helping to foster a recreation based economy.

Beyond my feelings I have read through the DEIR and was surprised at a number of issues this mine would bring to our community.

**Ind 512-2**

Ground Water - As someone who lives very close to the proposed site and is on a well I am very concerned about the effect on the ground water around the mine and beyond. As we see more severe drought conditions every year moving forward with a project that would have long lasting negative impacts to the local water table feels like a bad idea.

**Ind 512-3**

Home Value - My grandparents own a beautiful home right near the mine and our family is concerned about the reduced value this will bring to their property.

**Ind 512-4**

Noise - We can already hear substantial noise from the airport and business park and the reported noise from the mine sounds inexcusable in an area as residentially dense.

**Ind 512-5**

Air quality - As someone with Asthma I'm very concerned with dust from trucks, extraction from the mine and other operations. With already moderate air quality in the county on top of increasingly poor air from the extended fire season I may have to reconsider where I chose to live.

Thank you,

Luke Berliner





## **INDIVIDUAL LETTER 512: LUKE BERLINER**

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### **Response to Comment Ind 512-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 512-2**

Please see Master Responses 13 through 16. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 512-3**

The comment does not address the adequacy of the DEIR. Please see Master Response 2 – Social and Economic Issues.

### **Response to Comment Ind 512-4**

Noise is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

### **Response to Comment Ind 512-5**

Air quality is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.



**Individual Letter 513**

**From:** Lynn Forbes <lynnfrbs1@yahoo.com>  
**Sent:** Saturday, April 2, 2022 10:40 AM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** DEIR and the proposed mine

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**Do not click links or open attachments** unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Dear Mr Kelly:

In college I took a class called "How to Lie With Statistics." I hated that class because math was not my super power, but the concepts served me well in my career and in how I suss out information thrown at me every day by politicians, mortgage and insurance companies, car salesmen, vitamin labels, travel brochures - you name it.

The DEIR submitted by RISE Gold for the Idaho Maryland Mine project is just such a document. It is full of positive proof that this mine makes sense via mitigations, abatements, reductions, high-tech processes and engineering practices.

But the real question is: Does this mine make sense for Nevada County now and 80 years out? Do we place the next almost century of our community in the hands of people and a system that *by default* impacts water, air, energy usage, noise pollution, and more disruption than I will list here because you already know all of it.

We all develop a way to make the best decisions for our lives, for our families and for our community. Here is your chance to make the best decision for Nevada County. Read this DEIR over and over, dream about it in your sleep, think about the future and tell me - does the Rise Gold Mine make sense on any level for our precious community? I know you know - it does not.

Thank you,  
Lynn Forbes  
12288 Thoroughbred Loop  
Grass Valley, CA 95949  
415-517-6940

**Ind 513-1**



## **INDIVIDUAL LETTER 513: LYNN FORBES**

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### **Response to Comment Ind 513-1**

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the DEIR but does not provide specifics. Thus, a detailed response is neither possible nor required.



**Individual Letter 514**

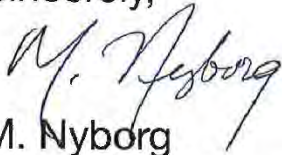
Matt Kelley  
Nevada County Planning Department

It's hard to believe that the owner of Rise Mine is even under consideration for this project. From his resume and history he is NOT a man of character or integrity.

And my bigger concern is a Board of Supervisors who are NOT responsive to public concern. WHY don't they put this to a vote? (NOT their vote) but a public vote. Straight forward and absolute.

ANY supervisor who is in favor of this project may well find his/her career in politics at an end. I would never vote for anyone who does not respond to the cry of their constituents.

Sincerely,



M. Nyborg  
14480 Craig Lane  
Grass Valley, CA.



Too close to NOT mind!!!



Ind 514-1

## **INDIVIDUAL LETTER 514: M. NYBORG**

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### **Response to Comment Ind 514-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 515**

Dist 1

**RECEIVED**

Nevada County Board of Supervisors  
950 Maidu Avenue, Suite 200  
Nevada City, CA, 95959

MAR 14 2022 Date: February 22, 2022  
NEVADA COUNTY  
BOARD OF SUPERVISORS

**Ind 515-1**

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,  
I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

**Ind 515-2**

I do not trust them. Look at their history, which I believe you must have done yourselves. They pollute and leave a disaster. Let's find other industries to boost our economy. We've already driven out prior businesses, and we've done little to entice anyone to replace them.

**Ind 515-3**

**Ind 515-4**

There are many reasons this mine should NOT be reopened. My personal reasons are:

**Ind 515-5**

· The mine will pollute our air and increase lung disease.

**Ind 515-6**

· Clouds of airborne toxic mining dust including asbestos will drift downwind into Grass Valley

**Ind 515-7**

· If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.

**Ind 515-8**

· There is serious risk to our health, our environment, our property value, and our peace and quiet.

**Ind 515-9**

· Hard rock mining is the single largest source of toxic waste in the United States.

**Ind 515-10**

· Vast amounts diesel exhaust from continuous operation, including the trucking in of explosives

**Ind 515-11**

· A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential)



<b>Ind 515-12</b>	· Crushing of 1,500 tons of mine waste every day, all day, using massive machines
<b>Ind 515-13</b>	· Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.
<b>Ind 515-14</b>	· Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area
<b>Ind 515-15</b>	· Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells
<b>Ind 515-16</b>	· Waste water will be dumped into South Fork Wolf Creek and destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems <i>→ from the last mining operations.</i>
<b>Ind 515-17</b>	· Use of over 12% of Nevada County's electricity, more than all the County businesses combined
<b>Ind 515-18</b>	· Numerous Rise Gold violations of mining and environmental laws in Canada and here – already
<b>Ind 515-19</b>	· Claims that a few hundred jobs could justify the likelihood of increased lung cancer (Nevada County currently has a surplus of unfilled job positions)
<b>Ind 515-20</b>	· Business life that depends on tourism will be hurt
<b>Ind 515-21</b>	· Homeowners stand to lose an estimated 20% in property values (and more if the well is dry)
<b>Ind 515-22</b>	· A working mine will damage neighborhoods with shattered peace and quiet
<b>Ind 515-23</b>	· Underground blasting is planned for seven days a week and will be felt by those living within the 2,585 acres of underground mineral rights the mine owns. See map!
<b>Ind 515-24</b>	· While Rise Gold shareholders (largely Canadian) profit, the local community gets little.
<b>Ind 515-25</b>	· The few theoretical jobs gained are hugely offset by the harm done. And there are several excellent suggestions in the Union to promote good jobs locally.
<b>Ind 515-26</b>	· Where will the imported workers live when housing is already so limited in our area? <i>?</i>
<b>Ind 515-27</b>	· 85% of vendor spending will not be local <i>?</i>



**Ind 515-28** · Nevada County revenue will be only from property taxes, all other taxes will go to the state

**Ind 515-29**  The history and business practices of Rise Gold do not inspire trust

**Ind 515-30** · Rise Gold has never opened a hard rock mine and has never made a profit on their business ventures to date

**Ind 515-31**  · Rise Gold CEO, Ben Mossman has been charged with environmental offenses in B.C. Canada courts

**Ind 515-32** · There are many questions as to the financial stability of this company.

**Ind 515-33** · The potential “breakout” from the mine’s contaminated settling pond during one of our “atmospheric river” storms is enormous.

**Ind 515-34** I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,



**Ind 515-35**

Name:

Madeleine Dowd

Address:

17023 Live Oak Lane, Grass Valley 95945-

Phone number:

530-308-6059

Email:

mandmcrising@hotmail.com





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## **INDIVIDUAL LETTER 515: MADELEINE DOWD**

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### **Response to Comment Ind 515-1**

The commenter urges the County not to approve the project. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 515-2**

The commenter references the Project Applicant's reputation. The commenter is referred to Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 515-3**

The commenter states that the County should look to other industries to do business in the County. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 515-4**

The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 515-5**

The commenter states that the project will pollute the air and increase lung diseases but does not provide any additional information. Air emissions from the project are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR and impacts are less than significant after mitigation. The commenter is also referred to Master Response 18 - Air Quality Thresholds.

### **Response to Comment Ind 515-6**

The commenter states that the project will result in toxic mining dust containing asbestos but does not provide any additional information. Air emissions from the project are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR and impacts are less than significant after mitigation. The commenter is also referred to Master Response 22 - Conservatism of Asbestos Assumptions.

### **Response to Comment Ind 515-7**

The commenter states that the Idaho-Maryland Mine would operate 24 hours a day, 7 days a week for 80 years but does not state how the DEIR is inadequate. Operating times for various activities of the project are provided in Chapter 3 (Project Description) of the DEIR.

### **Response to Comment Ind 515-8**

The commenter states the project poses serious risks to community's health, environment, and property values but offers not specific information regarding the physical impacts of the project. Air emissions from the project are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR and impacts are less than significant after mitigation. Regarding property values, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 515-9**

This comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers.



### **Response to Comment Ind 515-10**

The commenter states that project will result in vast amounts of diesel exhaust from project-related traffic. Air emissions, including diesel exhaust from haul trucks, are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR and impacts are less than significant after mitigation. The commenter is referred to Master Response 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criterion Pollution Thresholds during Operations. As stated in the Health Risk Assessment (HRA) performed for the project (see Appendix B of Appendix E.1 to the DEIR), for diesel haul trucks, estimated maximum daily trips were multiplied by 365 days to estimate annual trips. For all other trucks, daily emissions were estimated based on the anticipated maximum daily truck trips, and annual emissions were estimated based on anticipated average trips per week multiplied by 52 weeks per year. Total truck trips assumptions for the HRA are shown in HRA Table 7. Based on the HRA, which includes all construction and operational TAC sources of the project, the health risk to the maximally exposed individual resident (MEIR) would be less than significant after implementation of mitigation.

### **Response to Comment Ind 515-11**

This comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers.

### **Response to Comment Ind 515-12**

The commenter states that the project proposes to crush 1,500 tons of mine waste daily but does not comment on the adequacy of the DEIR. No crushing is proposed on surface. The commenter is referred to Chapter 3 (Project Description) of the DEIR.

### **Response to Comment Ind 515-13**

The commenter is concerned about the project-related traffic from the Brunswick Industrial Site to the Centennial Industrial Site but does not comment on the adequacy of the DEIR. Traffic and noise impacts are analyzed in Chapter 4.12 (Transportation) and 4.10 (Noise and Vibration) of the DEIR.

### **Response to Comment Ind 515-14**

The commenter is concerned about the project's underground blasting but does not comment on the adequacy of the DEIR. Blasting vibrations are analyzed in Chapter 4.10 (Noise and Vibration) of the DEIR and the impact is less than significant after mitigation. The commenter is also referred to Master Response 7 - Location of Future Mining Areas.

### **Response to Comment Ind 515-15**

The commenter is concerned about the dewatering of the mine but does not comment on the adequacy of the DEIR. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 515-16**

The commenter is concerned about the treated water discharged to South Fork Wolf Creek but does not comment on the adequacy of the DEIR. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 - Flows in South Fork Wolf Creek.





### **Response to Comment Ind 515-17**

The commenter is concerned about the project's use of electricity but does not comment on the adequacy of the DEIR. As stated on page 4.11-35 of the DEIR, PG&E provided a will serve letter for the project and has confirmed that there are electric facilities available to serve the proposed project in accordance with all applicable design standards, rules, and tariffs on file with the State of California Public Utilities Commission. Please also see Master Response 25 – Nevada County Energy Action Plan, and Response to Comment Agcy 8-17.

### **Response to Comment Ind 515-18**

The commenter references the Project Applicant's reputation. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 515-19**

The commenter states that the project will cause lung cancer but does not comment on the adequacy of the DEIR. Air emissions from the project are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR and impacts are determined to be less than significant after mitigation.

### **Response to Comment Ind 515-20**

The commenter states the project will negatively impact the County's tourism industry. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 515-21**

The commenter states that the project will adversely affect property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 515-22**

The commenter states the project will have adverse noise impacts but does not comment on the adequacy of the DEIR. Noise impacts from project's operations are determined to be less than significant after mitigation. The commenter is referred to Chapter 4.10 (Noise and Vibration) of the DEIR.

### **Response to Comment Ind 515-23**

The commenter states that underground blasting will be felt by local residents but does not comment on the adequacy of the DEIR. Blasting vibrations are less than significant after mitigation. The commenter is referred to Chapter 4.10 (Noise and Vibration) of the DEIR and Master Response 7 - Location of Future Mining Areas. As noted on page 4.10-44 of the DEIR, using average blasting noise levels from a comparable underground gold mine, the worst-case maximum noise levels at the nearest noise-sensitive receptors would range from 52 to 57 dBA  $L_{max}$ . The range of predicted worst-case blasting noise levels of 52 to 57 dBA  $L_{max}$  is below the daytime, evening, and nighttime dBA  $L_{max}$  criteria at the nearest receptors.

### **Response to Comment Ind 515-24**

The commenter references the economic impacts of the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.



### **Response to Comment Ind 515-25**

The commenter references the economic impacts of the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 515-26**

The commenter is concerned about available housing for workers from outside the County. As stated on page 4.9-27 of the DEIR, the project would provide employment opportunities that would result in indirect population growth. However, population growth resulting from the proposed project would not exceed the current housing stock in the area. Therefore, the project would not induce substantial unplanned population growth, and this impact would be less than significant.

### **Response to Comment Ind 515-27**

The commenter references the economic impacts of the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 515-28**

The commenter references the economic impacts of the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 515-29**

The commenter references the Project Applicant's reputation. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 515-30**

The commenter references the Project Applicant's reputation. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 515-31**

The commenter references the Project Applicant's reputation. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 515-32**

The commenter references the financial condition of the Project Applicant. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues

### **Response to Comment Ind 515-33**

The commenter is concerned about the potential failure of the settling pond but does not comment on the adequacy of the DEIR. The geotechnical stability of the treatment pond is analyzed in Chapter 4.6 (Geology, Soils, and Mineral Resources) of the DEIR and required mitigations would reduce the impact to a less than significance level. (DEIR Chapter 4.6 and Appendix H.1.)

### **Response to Comment Ind 515-34**

The commenter's opposition to the project is noted for decisionmakers. The commenter is referred Master Response 1 - Non-EIR/Administrative Issues



**Response to Comment Ind 515-35**

The commenter provides their contact information. The comment is noted.



**Individual Letter 516**

**From:** Maile McGrew-Fredé <maileclaire@gmail.com>  
**Sent:** Monday, April 4, 2022 1:36 PM  
**To:** Idaho MMEIR  
**Subject:** Comments on the DEIR for the Idaho-Maryland Mine Project

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TO: Mr Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue Suite 170  
Nevada City, CA 95959-7902

FROM: Maile McGrew-Fredé  
10826 Red Dog Road  
Nevada City, CA 95959  
505-692-0766 cell

RE: Draft Environmental Impact Report for Proposed Idaho-Maryland Mine Project

April 4, 2022

Dear Commissioners,  
I am a resident of Nevada County. Here are my concerns with the current DEIR for the proposed Idaho-Maryland Mine project.

**The Centennial Industrial Site:** First, I question the proposal to use as 'environmental baseline' the future (and still hypothetical) mitigation of this site. To do so seems to assume that the mitigation can only bring about an improvement to the environmental health and wellness of the area. However, such an assumption seems premature.

Ind 516-1

How do we know this proposed mitigation (involving excavation, concrete mixing and engineered pad creation) will result in any net gain to the health, safety and/or wellness of the land? Will this sort of mitigation function as a benefit to the ecosystem as a whole? Have there been any environmental studies or analyses measuring the current and possible long term effects of simply leaving the site as is--continuing with passive remediation, perhaps already underway at the site through the natural regrowth of forest, mycorrhizal soil networks, and native plant communities? Could it be that we are already seeing some potential mitigation happening through 'no action,' i.e. through allowing the natural world to reclaim and rewild this once toxic mess?

Perhaps the passive mitigation, through forest regrowth is providing better entrapment and/or diffusion/nullification of toxic material over time, than the proposed disruptions of excavation, concentration/capping and engineered fill may ever do? How will we know this without some studies? Perhaps the current environmental baseline is healthier for the land and community than the mitigations proposed? Have the carbon releasing effects of the proposed deforestation associated with the proposed mitigation been factored into this DEIR?

Ind 516-2

**The Hydrology Report**



Secondly, the DEIR seems to state that the only key impact of continuously dewatering 72 miles of tunnels beneath a large residential community, is the potential loss of 30 wells on Bennet Road. Isn't the number of wells that may be affected much much larger? How can this be the only potential impact?

**Ind 516-3**

What about harmful legacy sediments being disturbed and getting into ground water or residential wells? The mitigation efforts described in section 4.7-2(a,b) do not seem to go far enough to describe how this would be discovered and regulated. Are we simply to rely on Rise Gold and their own contractor to report the discovery of possibly contaminated soil or noxious odor?

**Ind 516-4**

More importantly, the mitigations in this DEIR don't address the big picture hazards. What about the potential changes to the water table as a whole? What about climate change and drought? The report is using 2019 water data (12 inches) to make its estimates for the entire operation period, but we've been seeing temperatures rise and water resources diminish consistently for many years now. How will the report take these conditions into account?

**Ind 516-5**

How would dewatering affect soil and vegetation in the Brunswick basin? How might it affect surrounding hydrology? Possible deleterious effects from unknown or unknowable outcomes represent potential hazards that should be thoroughly outlined in the report, possibly using past events; such as the dewatering of the North Columbia Diggins Mine on the ridge—resulting in the Grizzly Flats school losing their well (and still trucking in water to this day.)

**Ind 516-6**

How might dewatering affect local businesses, wetlands, streams, and/or other local water resources that our community relies upon, such as the Bitney Springs?

Thank you for taking these factors into account to further develop this DEIR.

Sincerely,  
Maile Claire McGrew-Frede





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## **INDIVIDUAL LETTER 516: MAILE MCGREW-FREDE**

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### **Response to Comment Ind 516-1**

The commenter questions the approach of adjusting the environmental baseline of the Centennial Industrial Site to use the post-remediation condition instead of the existing conditions at the Centennial Industrial Site. The commenter states that the “mitigation” of the Centennial Industrial Site (i.e., engineered fill placement for potential industrial pad development) is an environmentally inferior option compared to leaving the Centennial Industry Site as is and allowing “passive remediation” (i.e., natural regrowth of forest.) Lastly, the commenter asks whether the impacts of the proposed deforestation have been factored into the DEIR.

As discussed in the DEIR, the CEQA Guidelines and the courts have recognized that measuring the baseline from the existing physical conditions at the commencement of the environmental analysis does “not always provide the most accurate and understandable picture practically possible of the project’s likely impacts” (see DEIR, page 1-3). CEQA Guidelines Section 15125(a)(1) states that “a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence” where necessary to provide the most accurate possible of the project’s impacts (*Ibid*).

The commenter conflates the Idaho-Maryland Mine Project (placement of engineered fill at the Centennial Industrial Site) with the Centennial Industrial Site Clean-Up Project (DTSC-approved remediation). Engineered fill at the Centennial Industrial Site would only proceed if the DTSC-approved remediation is completed. The commenter is referred to Master Response 4.

Regarding the commenter’s preference that the Centennial Industrial Site be left as is, the DEIR addresses this with the “No Project” alternative (see DEIR, page 6-16). This alternative assumes that Centennial Industrial Site would be remediated under DTSC oversight, but would remain undeveloped under the project (*Ibid*). The DEIR also describes the resulting environmental impacts to the Centennial Industrial Site under the No Project alternative (see DEIR, pages 6-16 to 6-21). Lastly, the loss of carbon sequestration resulting from 5.3 acres of tree removal at the Centennial Industrial Site was factored into the DEIR (see Appendix E.1 AQ – GHG Report, pages 353 to 355).

### **Response to Comment Ind 516-2**

The commenter questions whether the DEIR underestimates the number of private groundwater wells that would be impacted from dewatering the mine. The commenter is referred to Master Responses 14 and 15.

### **Response to Comment Ind 516-3**

The commenter states that the proposed project would result in harmful legacy sediments being disturbed and getting into private groundwater wells. The commenter does not describe the source of the harmful legacy sediments being disturbed and getting into groundwater and residential wells. Because the mining activities would only lead to the drawdown of groundwater and do not provide recharge to the domestic wells, the mining activities at the project site should not affect the water quality of the domestic wells (see DEIR, Appendix K.8, page 14). Please also see Response to Comment Grp 25-30 regarding legacy contaminant concerns.



The commenter asks if the applicant would be required to report the discovery of possibly contaminated soil or noxious odor but does not provide information on where this soil or odor would be derived. Sediments and deleterious constituents in mine water would be removed by the water treatment plant before discharge to South Fork Wolf Creek. The commenter is referred to Master Response 35. Chapter 4.7 of the DEIR discusses and analyzes existing contaminated soil at the Brunswick site. Odors are analyzed under Impact 4.3-3 of the DEIR, which discusses odors and concludes the project would not have the potential to result in emissions leading to odors, which could adversely affect a substantial number of people (see DEIR, pages. 4.3-84 to 4.3-86). Regarding the reliance on the operator to report contaminated soil or noxious odors, the commenter is referred to Master Response 3.

#### **Response to Comment Ind 516-4**

The commenter states that the DEIR fails to examine several impacts, specifically the impact to the water table, and fails to take into account drought and climate change.

The DEIR analyzes the impacts to groundwater, including the potential impacts to the groundwater table. The commenter is referred to Chapter 4.8 of the DEIR (Hydrology and Water Quality) as well as Appendix K.2 (Groundwater Hydrology and Water Quality Analysis) and Appendix K.3 (Groundwater Model Report). Regarding the project's impacts on climate change, the commenter is referred to Master Response 16.

#### **Response to Comment Ind 516-5**

The commenter asks how the dewatering of the mine would affect soil and vegetation in the area as well as the surrounding hydrology. The DEIR discusses the dewatering effect on surrounding hydrology in Chapter 4.8 (Hydrology and Water Quality) and Appendices K.2 (Groundwater Hydrology and Water Quality Analysis) and K.3 (Groundwater Model Report) of the DEIR. The dewatering effect on soil moisture and vegetation is discussed on page 4.13-21 of the DEIR. The commenter is also referred to Master Response 33. The commenter states that possible deleterious effects from unknown or unknowable outcomes represent potential hazards that should be thoroughly outlined in the report but does not specify what these outcomes or deleterious effects are. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

#### **Response to Comment Ind 516-6**

The commenter asks how the dewatering of the mine would impact local businesses, wetlands, streams, and/or other local water resources. The dewatering of the mine and its impacts on local business, wetlands, streams, and other water resources is analyzed in the DEIR. The commenter is referred to Chapter 4.8 and Appendices K.2 (Groundwater Hydrology and Water Quality Analysis) and K.3 (Groundwater Model Report) of the DEIR. The commenter also invokes Bitney Springs as a local water resource that may be impacted by the project. However, Bitney Springs is located approximately four miles from the project site and well beyond the simulated drawdown from the project. Therefore, Bitney Springs would not be impacted by the project.



**Individual Letter 517**

**From:** [Maile McGrew-Fredé](#)  
**To:** [RCS Public Comment](#)  
**Subject:** Say NO to RISE GOLD  
**Date:** Monday, February 28, 2022 10:49:33 AM

Dist 1

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Dear Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

Thank you for serving as representatives of the people of Nevada County.

I feel certain you are each very kind, savvy and knowledgeable people, who are sincerely looking out for Nevada County, for its communities, critters, land, air, water...all of us, and our collective future.

That is why I have hope that even though Ben Mossman and his speculative company, Rise Gold have been allowed to come this far--- to purchase the land, own the mineral rights, test and explore and now propose a highly impactful hard-rock mining operation in the middle of our pastoral residential community, ***you are prepared to stand firm and simply say NO, not now, not ever, not in Nevada County.***

If I had to choose what I believe to be the absolute ***worst*** of the vast array of terrible, obnoxious, harmful and polluting impacts and outcomes this project is expected to have (using Rise Gold's own documents ), I would have to say it is the plan to use vast quantities of our precious groundwater as a *waste product*; set to be flushed, 'treated' and dumped, into Wolf Creek at the rate of millions of gallons each day. This won't happen just once, but is foundational to the project, and will go on each day, every day, for the next 80 years!

How can we even be considering such a thing in this moment, this current moment in which we are finally beginning to understand the depth of our environmental predicament---deepening drought, species loss, forest loss and wildfire threat? Draining the shafts means *throwing away* our precious, ***priceless water***,... but first, fouling it, stirring up hundred-plus year old sediment sleeves of legacy mining toxics such as lead, asbestos and mercury.

What's more, proposals like this one are now cropping up ***all over the Sierra*** simply because the price of gold has changed. This is unacceptable. The few jobs that Rise Gold is promising can never make up for the losses that will be sustained if we allow this project to go forward. We need *green jobs* in Nevada County, a green (and moist) future, not a slow sad extension of the toxic legacy that stains our past.

**Let's lead the way in the Sierra Nevada by stepping away from an unsustainable, extraction-based past, and stepping into a renewable future.**

Sincerely,  
Maile Claire

Ind 517-1



Maile Claire McGrew-Frede  
10826 Red Dog Road  
Nevada City, CA 95959  
505-692-0766



## **INDIVIDUAL LETTER 517: MAILE MCGREW-FREDE**

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### **Response to Comment Ind 517-1**

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

The commenter provides general comments on groundwater, water discharge, sedimentation erosion of creek beds (stirring up legacy mining toxics), drought, species loss, forest loss, and wildfire but does not provide specific reasons as to why the DEIR is inadequate. The DEIR analyzes these issues in Chapter 4.4 (Biological Resources), Chapter 4.8 (Hydrology and Water Quality), and Chapter 4.13 (Wildfire). Please also see Master Response 35 – Discharge to South Fork Wolf Creek, and Master Response 16 – Drought and Climate Change. In addition, please see Response to Comment Grp 25-30 regarding legacy mining concerns.





**Individual Letter 518**

Mardi Naythons  
15450 S Ponderosa Way  
Grass Valley, CA, 95949  
March 31, 2022

Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA, 95959

Dear Mr. Kelley and Members of the Planning Department,

**Ind 518-1**

I am writing to express my opposition to the Draft EIR submitted for approval by Rise Gold. The report has several points which I believe are misrepresented or conclusions reached without critical scientific data.

**Ind 518-2**

My first concern is with the potential damage due to dewatering. Though the report says that the dewatering will affect only 7 (to 30) parcels, it could actually affect many more. One only has to look at the exhibit of all the mine tunnels under Grass Valley at the Empire Mine museum to realize that there is potential for wider damage from dewatering. Additionally, there are two clauses in the report that I find disturbing. First that provisions will only be allowed for the original parcel owners and that they will only cover damages occurring within the first 20 years and the mine is expected to operate for 80 years. If that isn't enough, think about the potential for sink holes under Grass Valley.

**Ind 518-3**

The report says that noise will be minimal and shouldn't affect the public. Please consider that some people are sensitive to vibration in addition to actual noise. Also, some people are generally more sensitive to noise, it is going to be 24 hours a day, There won't even be the reprieve on quiet in the evenings.

**Ind 518-4**

Having the trucks carrying mine tailings to be processed will create more pollution to the air. Our air quality is already amongst the worse in the state. It is not a good idea to create more pollution. All that diesel exhaust won't help the situation.

**Ind 518-5**

The DEIR states that the previous accumulation of contamination at the Centennial site has already been cleaned up by Rise Gold. In fact, it has not been and there is no provision or teeth for the county to make sure it is cleaned up.

**Ind 518-6**

Finally, though it is stated that Rise Gold has established a bond to be financially responsible for damages, their track record does not indicate that this will be guaranteed. They have not paid for damages at the Bank Island site in British Columbia due to bankruptcy.

**Ind 518-7**

Though this letter speaks mainly to the Draft EIR, I will close by saying that this is really the wrong industry to bring back to our area. Yes, there is mining history in Nevada County, but there is also unmitigated desecration and contamination left here by mining for us to endure forever.

Please consider all of this before granting permission for the mine.

Sincerely,

  
Mardi Naythons



## **INDIVIDUAL LETTER 518: MARDI NAYTHONS**

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### **Response to Comment Ind 518-1**

The comment expresses a general opinion that the DEIR is not adequate, but does not provide specific examples that would allow for a detailed response. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 518-2**

Please see Master Responses 14 and 15 regarding dewatering concerns. Please see Master Response 29 – Near Surface Workings, regarding sink hole concerns. The commenter incorrectly states that the applicant would only pay for potable water charges to impacted properties for 20 years. According to the Well Mitigation Plan, reimbursement for water charges will continue throughout the 80-year permit term of the mine unless one of the following occurs:

- 1) The property is sold by the owner after the NID connection is accomplished and paid for by Rise.
- 2) The property is annexed into the City of Grass Valley.

As discussed in Master Response 15, a new homeowner would not be impacted because the impact would have previously occurred, and the cost of purchasing water from NID for that new homeowner would be the same as buying any other home connected to NID's water supply. The provision of free water as a selling feature to a new buyer is not contemplated by the policy. If a property was annexed into the City of Grass Valley, it would be subject to the ordinances of the City which allows water wells to only be used for irrigation purposes only (Grass Valley General Ordinance Section 13.16.020) and would therefore require a property owner to connect to the potable water supply and pay for their water use. As annexation of a home into the City would already require connection to NID water supply and purchase of NID water, continuation of payment for water by the applicant after annexation would be a windfall to the property owner rather than mitigation of an impact, and is not required by CEQA or County policy.

### **Response to Comment Ind 518-3**

Please see Chapter 4.10, Noise and Vibration, of the DEIR, which evaluates potential groundborne vibration impacts to sensitive receptors in the project vicinity. In addition, please see Master Response 1.

### **Response to Comment Ind 518-4**

Diesel emissions from haul trucks were addressed in the Health Risk Assessment prepared for the project. As stated in the Health Risk Assessment (HRA) performed for the project (see Appendix B of Appendix E.1 to the DEIR), for diesel haul trucks, estimated maximum daily trips were multiplied by 365 days to estimate annual trips. For all other trucks, daily emissions were estimated based on the anticipated maximum daily truck trips, and annual emissions were estimated based on anticipated average trips per week multiplied by 52 weeks per year. Total truck trips assumptions for the HRA are shown in HRA Table 7. Based on the HRA, which includes all construction and operational TAC sources of the project, the health risk to the maximally exposed individual resident (MEIR) would be less than significant after implementation of mitigation.



**Response to Comment Ind 518-5**

The DEIR does not state that the previous accumulation of contamination at the Centennial Industrial Site has already been cleaned up by the applicant. The commenter misinterprets the use of the adjusted environmental baseline for the Centennial Industrial Site, which is discussed in Chapter 1, Introduction, of the DEIR.

As explained on pages 1-4 through 1-6 of the DEIR, in accordance with CEQA Guidelines Section 15125(a)(1), substantial evidence exists to support adjusting the environmental baseline for the Centennial Industrial Site to use the post-remediation condition instead of existing conditions at the Centennial Industrial Site. Such adjustments will give the public and decisionmakers the most accurate and understandable picture of the proposed project's potential impacts for certain resource topics affected by landform alteration/soil disturbance activities, as discussed in the bullet points on pages 1-6 and 1-7 of the DEIR. For evaluation of other resource topics, the environmental baseline is existing conditions at the Centennial Industrial Site as those resource evaluations are less dependent on landform/soil disturbance. See also Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

**Response to Comment Ind 518-6**

The comment does not address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility.

**Response to Comment Ind 518-7**

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 519**

**From:** Margaret Joehneck <margaretjoehneck@gmail.com>  
**Sent:** Monday, April 4, 2022 10:13 AM  
**To:** Idaho MMEIR  
**Subject:** Letter re: Opposing the re-Opening of the Idaho Maryland Mine

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**Ind 519-1**

I'm not a resident that lives close to the mine or even in Grass Valley or Nevada City, but at the southernmost end of the county in Lake of the Pines. So, why do I oppose this mine being reopened?

First, one of the main reasons for our move into Nevada County was for the ambience of Grass Valley and Nevada City- the historical and cultural activities and atmosphere. I, and my late husband, most enjoyed shopping, dining, attending musical performances, the art walks, and the farmer's markets. Since I intend to continue this tradition, something this risky should not be allowed to happen in this lovely area.

**Ind 519-2**

I hear that the main argument for reopening the mine is "jobs." Why would a county with a housing and a worker shortage want to risk anything to provide more jobs?

Finally, as a tax-paying citizen of Nevada County and a customer of NID, I don't want to be a part of paying to pick up the pieces if the number of wells that would be affected is severely underestimated or disaster strikes, as it did in Canada, and the company files bankruptcy leaving us with a mess.

**Ind 519-3**

Margaret Joehneck  
12501 Wanderer Rd.  
Auburn, CA 95602  
530-748-5146



## **INDIVIDUAL LETTER 519: MARGARET JOEHNCK**

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### **Response to Comment Ind 519-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 519-2**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

### **Response to Comment Ind 519-3**

Please see Master Responses 3 – Operator Responsibility, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 520**

**From:** Margaret Vodicka <margaret\_vodicka@hotmail.com>  
**Sent:** Monday, March 21, 2022 10:58 AM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** Comments on Idaho-Maryland Mine DEIR

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March 21, 2022

Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

**SUBJECT:** Comments addressing the Draft Environmental Impact Report (DEIR) on the Re-Opening of the Idaho-Maryland Mine

**Ind 520-1**

As a long time resident of Nevada County, I am most concerned about the effects on our water that the re-opening of the Idaho-Maryland Mine will have. We are going through a major drought and the DEIR does not adequately address the threat to our water. The following needs to be addressed by outside experts not just those hired but Rise Gold.

**Ind 520-2**

- 3.6 million gallons of treated wastewater will be released every day into South Fork Wolf Creek for 6 months, then 1.2 million gallons a day after that.

**Ind 520-3**

- Mine dewatering risks depletion of our region's groundwater, impacting drought-related scarcity and the future price of water.
- Many hundreds of private wells are at risk because groundwater impacts of mining are truly unpredictable.
  - Rise Gold's claims of "zero risk to wells" are based on a flawed, privately funded hydrology study.
  - Potential well risks include: reduced output, contaminated water, or complete failure with no clear plan for a reliable or affordable replacement source.

**Ind 520-4**

This project will impact our local water supply and we can not afford to lose this precious resource. Further study is required to ensure we have sufficient, quality water for our community.

Sincerely,

Margaret and Milan Vodicka  
14219 Rollins Park Dr.  
Grass Valley, CA 95945  
[margaret\\_vodicka@hotmail.com](mailto:margaret_vodicka@hotmail.com)



## **INDIVIDUAL LETTER 520: MARGARET AND MILAN VODICKA**

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### **Response to Comment Ind 520-1**

Please see Master Response 35 – Discharge to South Fork Wolf Creek, Master Response 36 – Flows in South Fork Wolf Creek, and Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 520-2**

Please see Master Responses 14 through 16.

### **Response to Comment Ind 520-3**

Please see Master Responses 14 through 16.

### **Response to Comment Ind 520-4**

Please see Master Responses 14 through 16 and Response to Comment Ind 520-1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 521**

Dist 1

February 17, 2022.

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FEB 18 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Dear Nevada County Supervisors;

Businesses, homeowners, and conservationists in Nevada County are joining together to protect our neighborhoods, our local economy, and our quality of life from the Rise Gold proposal to re-open the Idaho-Maryland Mine. We urge the Board of Supervisors to reject this destructive proposal and instead protect our community.

We face new environmental challenges and this project seems to be a step in the wrong direction. Our duty is to protect our land and natural resources and not exploit them to their limit. As a mother I urge you to think about what world we want for our next generations and encourage you to look at our past and at the past of this Rise Gold. This is not what we want for our community.

In gratitude for your service,

Maica Fernanda Beunel



Ind 521-1



## **INDIVIDUAL LETTER 521: MARIA BENNER**

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### **Response to Comment Ind 521-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 522**

March 21, 2022

Matt Kelley  
Senior Planner, Nevada County Planning Department  
950 Maidu Avenue Suite 170  
Nevada City, CA 95959-7902

**Submitted by Marion Blair 12182 Sunset Avenue, Grass Valley, CA 95945**  
*Santa Clara Valley Water District 2006- 2021: Biologist, Vegetation Maintenance Worker, Engineering Technician, Field Operations Administrator, Vegetation Program Specialist in Vegetation Field Operations Unit. Retired.*

*B.S. Biology; M.S. Environmental Studies. Secondary Life Science teaching credential; Licensed California Department of Pesticide Pest Control Advisor.*

Dear Matt

I have a concern that the Draft Environmental Impact Report (DEIR) is opaque in that there are reports hidden within reports, some of which are inaccessible. The following is a general example. Most sites as contaminated as the Centennial site are required by the state of California to adhere to guidelines under the California Surface Mining and Reclamation Act (SMARA). However, Rise Gold is "working with the California Department of Toxic Substances Control (DTSC) to develop a plan that consolidates, and caps contaminated soil... consistent with state and federal regulation." Therefore, the DEIR concludes, "The environmental cleanup work at the Centennial Site will be completed under the DTSC voluntary cleanup program and is not a component for review under SMARA."

Ind 522-1

Continuing along this line of concern is the overt obfuscation created by frequent references to the Department of Toxic Substances report (DTSR) for "remediation" of various impacts. That report is not completed, so it is impossible to reference it. Terms used in conjunction with these ambiguous statements such as "reasonably anticipated, expected, in the event, may, etc..." are projecting into the future, not based in reality. This is termed denial. They are vague and ephemeral, contributing to the obfuscation of the true impacts of this mining operation. Without this report, how are we to verify that there are no or there are minimal environmental impacts, as frequently stated in this DEIR? Claiming that work will be done under a *voluntary* cleanup program according to an *unwritten* report, is far from convincing.

For example, p. 1-6 in the introduction of the DEIR states: "The separate Centennial Clean-Up Project would be completed before implementation of project-related activities at the Centennial Industrial Site and would result in the alteration and/or removal of





Ind 522-2

certain habitats capable of supporting special-status species. Therefore, for the purposes of the analysis of biological resources, the environmental baseline for the Centennial Industrial Site has been adjusted to reflect the reasonably anticipated conditions of the site following the remediation activities (CEQA Guidelines Section 15125(a))” This is but one of many such references to remediation activities in the DEIR. What are those remediation activities? How can analysis of impacts to these biological resources be complete? Without complete analysis how can conclusions be justified without this information?

As a wildlife biologist and plant specialist I have several concerns. I question the adequacy of the survey techniques for the listed amphibians, the threatened California Red Legged Frog (CRLF) and the species of concern, the Foothill Yellow Legged Frog (FYLF). The report does not state whether the visual surveys were performed at night, which is the best time to capture and positively identify breeding CRLF. <sup>1</sup>

Please note that accuracy of visual surveys is weather dependent due to the breeding behavior of frogs. In 2018 three surveys were conducted by Greg Matuzak in December, which is typically breeding season and thus the best time to observe adult frogs. Rainfall history from that month indicates the following rainfall dates and amounts compared to the actual survey dates:

SURVEY DATES	RAINFALL DATES/INCHES
Dec 9-12	Dec 1- <0.5"; Dec 5- <0.25"
Dec 17-18	Dec 16-17 - <3"; Dec 23-24 - 3-4"
Dec 30	No rainfall approximate to this date

The only rain event that produced enough precipitation to trigger significant breeding behavior in the two species of frogs was December 23-24.<sup>2</sup> Field surveys were conducted well before and after these dates, with the likelihood of enough water for breeding to be very low. Therefore, the survey methodology is incomplete, and neither presence/absence of adults, nor for egg masses can be verified from these minimal visual surveys.

The most accurate way to sample for amphibians is environmental DNA sampling, a definitive and inexpensive way to verify species of such importance, that has been used in wildlife sampling for the past 15 years.<sup>3</sup> Considering global declines of amphibians in general, and rapidly shrinking habitat for the two listed species of frogs in this region of California, this technique should be used to determine absence/presence in addition to multiple presence/absence surveys that are correctly timed.

Minimizing the likelihood of the presence of listed amphibian species does not mean they aren't there and that impacts won't be significant. Table 4,4-6 states that the



↑ likelihood of CRLF and Foothill yellow legged occurrences in the Centennial site wetlands are “low” based on historical records of the California Natural Diversity Database (CNDDDB). Appendix F.2 states that there is “marginal suitable habitat for CRLF and FYLF.” The DEIR minimizes impacts by stating it is “unlikely” they occur in this area. This freshwater marsh is significant habitat to many listed fauna, whether observed or not because it is a perennial aquatic resource.

Ind 522-3 Mitigation of the significance of impacts to wetlands and thus the habitat of species that depend on them is repeatedly minimized in this DEIR. The mitigation caveat presented in the DEIR of wetland impacts is: “However, in the event that the currently proposed remediation boundary limits are modified by DTSC prior to commencement of remediation, this EIR addresses the possibility that some amount of freshwater emergent marsh wetland habitat may remain on the Centennial Industrial Site post-remediation.” This is another example of manipulation of information regarding true mitigation by obscuring it. As proposed mitigation to these sensitive habitats, this is unacceptable.

What is the specific quantity of “some amount”? These delineated wetlands are too important ecologically to pave over, even partially, regardless of the ability to obtain Federal permits. How do the biologists justify minimizing the environmental impacts of this mine project on the delineated wetlands of both the Centennial and the Brunswick Sites that occurs throughout the DEIR? Even drainage in ditches on the Brunswick and East Bennet ROW has potential to be amphibian habitat, as I have personally observed throughout the agricultural ditches in southern Santa Clara County.

Mitigation of impacts to the Western Pond turtle (WPT), another species of concern whose life cycle is dependent on wetlands, are inadequately mitigated. Yet, the likelihood of this being WPT habitat is listed as “high” (Table 1.1, Section 1,4).

**Table 2.1, p 2-40 Summary of Impacts and Mitigation Measures states:**

*A pre-construction survey shall be conducted by a qualified biologist no more than seven (7) days prior to the proposed disturbance within 325 feet of perennial water sources at both the Centennial and Brunswick Industrial Sites. The survey(s) shall include a search of these suitable habitat areas for western pond turtle nests and mature adults.*

Ind 522-4 Additionally, the same table states, “During the spring or early summer, females move overland up to 325 feet to find suitable sites for egg laying”. Despite spring and summer spanning many weeks, the only requirement for determining presence/absence of the WPT is one (7) day advance pre-construction survey.

New hatchlings instinctively head toward the water. There must be continuous habitat to their upland nesting areas, or hatchlings will be crushed by the trucks. There is no mention of the significance of connectivity of habitat. This is a critical time in the turtle’s life cycle.

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Ind 522-5

The following mitigation measures are inadequate.

*If a western pond turtle is found, it should be allowed to move out of the way of the disturbance zone on its own or a qualified wildlife biologist with a CDFW handling permit for the species can move individuals out of the disturbance areas to avoid impacting this species.*

*If a nest is documented during pre-construction surveys, a non-disturbance buffer shall be established, as determined by a qualified biologist, based on the location of the nest until all eggs have hatched and the juveniles have dispersed out of the.*

What specific measures will be taken to allow turtles to “move out of the way?” Will operations cease temporarily, and if so, who will enforce a cessation of work? As for the possibility of a biologist finding a nest during pre-construction surveys, if the non-disturbance buffer were to necessitate the inclusion of a roadway due to the location of the nest, what mitigation will occur?

From my experience with an active sand mine in the Bonny Doon area of Santa Cruz Mountains where critical CRLF habitat was designated by CDFW, there was simply a sign that said “Red legged frog crossing,” which truck drivers ignored. I asked the on-site manager if this was a joke. He assured me this was their compliance with CEQA. How are we to trust that Rise Gold employees have any concern as to the fate of Western Pond turtles if mitigation is minimized?

The proposed mine will impact the important migratory corridors served by the habitat islands at both the Centennial and Brunswick sites, which help connect fragmented habitats for all types of wildlife: birds, mammals, amphibians, reptiles, as well as plants. An example of the DEIR minimizing this importance is the following regarding the California black rail, another species of concern. Appendix F.3 p. 18 states:

“Suitable habitat of this species occurs within the large marsh wetlands within the eastern section of the the Centennial Industrial Site where there is permanent ponding of water and dense vegetation. The species has not been documented within the Centennial Industrial Site but has been identified within 5 miles to the southeast and southwest of the Centennial Industrial Site.”

Yet, the DEIR minimized the significance of this wetland's habitat value by following the previous statement with, “This species has a low likelihood of occurring within the Centennial Industrial Site.” Has there been any consideration of the value of habitat connectivity for avian species?

Have the cumulative effects of impacts to these sites been considered when deciding the significance of the impacts? It is important to consider all such impacts to diminishing wetland species and riparian corridors in this foothill landscape of California





↑ already severely degraded by previous mining, habitat loss, and drought. How does this DEIR align with the Nevada County General Plan which states "...vegetation management for the benefit of habitat preservation"?

Ind 522-6

Finally, with regards to aquatic wildlife, it should be noted that releasing large quantities of secondary treated water pumped out of the mining tunnels into Wolf Creek will have negative impacts on mollusks, invertebrates, and fish. Bio magnification will affect river otter, beaver in Wolf Creek as well as the rivers that the creek is a tributary of. These include the Bear River, Yuba River, Sacramento River, and the Delta, which is the base of the food web of one of the world's the largest fisheries. Table 4.8-2 on p 4.8-44 lists the various heavy metals and metalloids that are found in the tunnel water at current levels. However, for those that bioaccumulate such as lead, chromium, mercury, zinc, cyanide, and arsenic the column for post-treatment is left blank. Is this because secondary treatment of wastewater does not remove these? Many of them remain in the sediments removed from primary treatment, but not all. What is to prevent them from ending up in the sediments of Wolf Creek, along with other suspended metals and metalloids not removed by primary or secondary treatment? Sedimentation from runoff will also suffocate spawning gravels necessary for rainbow trout whose eggs require highly oxygenated water to survive. Metals can be ingested and absorbed by macroinvertebrates such as mollusks and insects, which are magnified up the food chain to fish, mammals, and birds. How are these conditions to be mitigated in Wolf Creek and beyond?

When impacts aren't minimized in the report, mitigation is. For example, the endangered Pine hill flannel bush, *Fremontodendron decumbens*, a rare species with a limited endemic range, may count fewer than 200 plants in three counties: Butte County, El Dorado County, and Nevada County. Ecologically, we cannot afford to lose any of these plants. To quote Calflora <sup>4</sup> "Locally rare plants play an important role in helping to preserve the diversity of the species, as well as the gene pool of local flora."

I believe the proposed mitigation measures for *Fremontodendron decumbens* (Pine hill flannel bush) on page 4.65 is inadequate as is the Habitat Management Plan (Appendix F-4)

Ind 522-7

*Transplanting;*  
*Transplant the individuals of Pine Hill flannelbush that fall within the disturbance footprint to another site with similar soil, hydrologic, vegetation type and aspect. The transplantation site(s) selected shall extend the known population spatially, in other words, planting beyond the known perimeters of the existing population is preferable, to maintain population coverage. Transplanting shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced.*  
*4. Transplant Monitoring; and*  
*Transplants shall be monitored every month for the first six months, then subsequently, every two months for the first two years. After monitoring identifies successful establishment and flowering for the second season for each of the transplants, transplanting will have*

↓



been deemed successful.

5. *Alternative Measures to Transplantation and Seed Collection (if required pursuant to the criteria in the HMP)*

*If Steps 1-4 of the HMP are not successful in maintaining the Pine Hill flannelbush population numbers, then the following measures shall be taken:*

- Individuals shall be grown from seed and transplanted out in a 100:1 ratio for those taken.*
- Transplants of individuals grown from seed shall be planted with similar soil, hydrologic, vegetation type and aspect.*
- Transplanting shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced.*
- Transplants shall be monitored every month for the first six months, then subsequently, every two months for the first two years.*

In my experience as a vegetation program specialist for a large water agency where I planned and implemented mitigation through vegetation (riparian and wetland) restoration, *Fremontodendron* species are difficult to propagate and impossible to transplant with any significant success rate. Though the mitigation references a nursery for propagation, based on my experience it will require 3-5 years of maintenance with irrigation, for these plants to become established after planting. Yet this plan provides for only two years of monitoring.

Ind 522-8

Why is there no mention of irrigation in the maintenance of these plants? From experience, I can predict they will not survive without it. The mitigation measures described above are thus inadequate.

The following quotes from the California Native Plant Society (CNPS) support my conclusions about the inadequacy of the DEIR's proposed mitigation for this rare plant. The CNPS is the standard measured against by plant community specialists and botanist in California.

<sup>5</sup> "Monitoring rare plants and habitats during all phases of a project will help ensure that construction and operation activities do not encroach on protected habitat."

Ind 522-9

"The Society does not endorse alteration of naturally occurring plant communities through transplantation because the methodology for most rare plants is untested and therefore unreliable and because most past attempts have ultimately failed."

<sup>6</sup> "In most instances off-site compensation does not fully reduce impacts to an insignificant level because a net loss of individuals or habitat that supports a natural self-sustaining rare plant population results."

There need to be clear implementation and monitoring plans which will be provided to the appropriate regulatory agencies. I did not observe these in the DEIR, therefore, the





Ind 522-10

mitigation is inadequate. I do not believe this plant can be mitigated to an acceptable level.

**According to the DEIR** “The EIR determined that, at both the Centennial and Brunswick Industrial Sites, implementation of the proposed project could result in potential significant adverse effects to special-status plants, foothill yellow-legged frog, western pond turtle, California red-legged frog, California black rail, coast horned lizard, special-status bats, and non-special status raptors and migratory birds. The proposed project would also result in a significant impact to mapped streams and wetlands. However, the EIR requires mitigation in order to ensure that impacts related to the aforementioned biological resources would be reduced to less-than-significant levels.”

**The mitigation measures in the DEIR are INADEQUATE for this level of significant impacts. How could approving the EIR be justified in any way?**

#### Citations

<sup>1</sup> US Fish and Wildlife Service Revised Guidance on Site Assessments and Field Surveys for the California Red-legged frog (August 2005)

URL: [file:///C:/Users/mario/AppData/Local/Temp/CRF-Survey-Guidance%20Aug2005\\_FINAL.pdf](file:///C:/Users/mario/AppData/Local/Temp/CRF-Survey-Guidance%20Aug2005_FINAL.pdf)

Retrieved: 02.22.22

<sup>2</sup> Grass Valley December 2018 Historical Weather Data

URL: <https://weatherspark.com/h/m/1178/2018/12/Historical-Weather-in-December-2018-in-Grass-Valley-California-United-States>

Retrieved: 02.15.2022

<sup>3</sup> USGS. 2018. Environmental DNA Sampling

URL: <https://www.usgs.gov/special-topics/water-science-school/science/environmental-dna-edna>

Retrieved: 03.05.2022

<sup>4</sup> Calflora; URL: <https://www.calflora.org/>

<sup>5</sup> California Native Plant Society Policy Regarding Mitigation of Impacts to Rare and Endangered Plants (Appendix A) by California Native Plant Society Rare Plant Scientific Advisory Committee (February 1991, revised April 1998)



<sup>6</sup> California Native Plant Society Rare Plant Scientific Advisory Committee (*February 1991, revised April 1998*)  
URL: <https://www.cnps.org/conservation/endangered-species/mitigation-impacts-policy>  
Retrieved 2.15.2022

**Please send confirmation you have received this to:**

[mbhomechef@comcast.net](mailto:mbhomechef@comcast.net) and [marionkblair@gmail.com](mailto:marionkblair@gmail.com)

**Respectfully,**

**Marion**



## **INDIVIDUAL LETTER 522: MARION BLAIR**

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### **Response to Comment Ind 522-1**

The California Surface Mining and Reclamation Act regulates surface mines in California with regard to surface mining activities occurring after January 1, 1976. (see California Public Resources Code Section 2776(c).) The Centennial Industrial Site does not have active, permitted surface mines; all mining activity on that site ceased prior to January 1, 1976, and therefore SMARA does not apply. If this project is approved, SMARA would apply prospectively to above-ground surface disturbance associated with approved project activities, not to historic mine waste on the Centennial Industrial Site.

The Department of Toxic Substances Control's primary purpose is to enforce hazardous waste laws and regulations and restore contaminated land. The Centennial Industrial Site is an identified contaminated site and the applicant has been working DTSC to identify an appropriate plan to clean-up the property.

Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

### **Response to Comment Ind 522-2**

Please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog, regarding impacts to amphibian species, and Master Response 30 - Biological Study Technical Adequacy. Foothill yellow-legged frog surveys followed CDFW protocol, including implementing VES surveys for the species. VES surveys were implemented in August 2019 and in June 2022 within three locations starting at the culvert discharge location within the Brunswick site, as well as two additional stretches downstream and no foothill yellow-legged frogs were identified within South Fork Wolf Creek. The California red-legged frog assessment within the DEIR was based on an analysis of 1) where are the closest known locations of the species from the project site (over 5 miles), 2) is there suitable upland or aquatic breeding habitat for the species within the project site, and 3) is there any likelihood that the species would move into the project site from other breeding ponds within the greater Grass Valley area. The DEIR determined that the likelihood of CRLF breeding within a highly impacted environment, such as the ponds located within the project site, is considered very low because of the historical mining impacts within the project site and the level of development within and adjacent to the project site. Given that CRLF have not been identified in the Grass Valley USGS Quadrangle, the watershed associated with the project area, or within 5 miles of the Brunswick Area, the potential for this species to occur is considered extremely low. CDFW acknowledged CRLF as a species of concern for the proposed project in their April 4, 2022 comment letter on the DEIR and did not have raise any objections to the proposed mitigation for CRLF, nor did they recommend any additional mitigation for CRLF.

### **Response to Comment Ind 522-3**

DEIR section 4.4 conservatively assumed a greater impact than this project proposes in the event the separate DTSC clean-up project is modified such that less surface disturbance occurs. As stated in DEIR section 4.4.2 (page 4.4-3):

The acreage of each vegetation community type at the Centennial Site is a good-faith estimate because it cannot be precisely established for the baseline condition given that the baseline has been adjusted to account for the separate remediation efforts that will be conducted under the California Department of Toxic Substances Control (DTSC) oversight pursuant to the Remedial Action Plan (RAP) prepared for DTSC approval. The vegetation community acreage estimates included in this analysis are conservative in the event that minor changes to the RAP are made prior to final approval by DTSC. DTSC, as the CEQA



lead agency for approval of the RAP and its associated CEQA document, will separately require the applicant to mitigate impacts to sensitive habitats and species resulting from remediation activities.

Please see Response to Comment Grp 20-8 and Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

### **Response to Comment Individual 522-4**

As noted in Mitigation Measure 4.4-2(b), in addition to allowing an identified western pond turtle to move out of the way on its own, an option is also provided that a qualified wildlife biologist with a CDFW handling permit may move an individual out of the disturbance area. As a result, if a western pond turtle is identified during a preconstruction survey, they can safely exit the disturbance area either through their own movement or by a qualified biologist. Additional detail has been added to this Mitigation Measure in the Final EIR (see below) regarding the cessation of work until the identified turtle has cleared the area, fencing to prevent access, and other protection measures to prevent reentry. Page 4.4-77, Mitigation Measure 4.4-2(b), is hereby revised as follows:

#### *Western Pond Turtle*

4.4-2(b) *Pre-construction Survey and Avoidance and Minimization Measures. A pre-construction survey shall be conducted by a qualified biologist no more than seven (7) days prior to the proposed disturbance within 325 feet of perennial water sources at both the Centennial and Brunswick Industrial Sites. The survey(s) shall include a search of these suitable habitat areas for western pond turtle nests and mature adults. If the pre-construction survey does not detect western pond turtle, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. If a western pond turtle is found, it should be allowed to move out of the way of the disturbance zone on its own or a qualified wildlife biologist with a CDFW handling permit for the species can move individuals out of the disturbance areas to avoid impacting this species. Work in the area shall cease and fencing or other protective measures shall be employed to excluded and prevent access to the area until the identified turtle has cleared the area.*

The above change is for clarification purposes, describing protective measures to be employed in the event a turtle is found on-site. The conclusions of the DEIR have not been altered.

The commenter is also concerned about encountering turtles during ongoing operation of the mine. Pre-construction surveys and avoidance are for initial ground disturbance and construction. Following construction, natural areas will not be present within the active mining area, and as a result, turtles would not be expected to occur in the mining area.

### **Response to Comment Ind 522-5**

The CEQA guidelines require analysis of substantial interference to "the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." Migration is defined as the seasonal movement of animals from one habitat to another. Various animal, bird, and fish species are not automatically considered migratory just because they move from one location to another. Migration serves a purpose for the species such as winter/summer habitat for foraging or breeding. It is acknowledged and analyzed in the DEIR impact analysis (see section 4.4.4) that species exist within the project site that are common to the area. Potential impacts to these species were analyzed and mitigation measures have been provided where it was determined



impacts to species could occur as a result of project activities, including the implementation of preconstruction surveys and agency permitting requirements. The only migratory species acknowledged by the County General Plan is deer migration corridors. Impact 4.4-4 addressed the project's impact to this potential migratory corridor and concluded the impact would be less than significant. The commenter also refers to Policy 13.1 of the Nevada County General Plan to imply that the project is inconsistent with this policy, but the commenter only cites a portion of the sentence out of context. Policy 13.1 states "Vegetation management for the benefit of habitat preservation or restoration shall be considered consistent with the intent of this policy." However, it does not say all existing vegetation must be preserved and managed, which the commenter implies. The project is not inconsistent with General Plan Policy 13.1. (see p. 4.4-46 of the DEIR.)

#### **Response to Comment Ind 522-6**

Please see Master Response 36 - Flows in South Wolf Creek and Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the impacts to fish, discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

#### **Response to Comment Ind 522-7**

The commenter generally questions the effectiveness of Mitigation Measure 4.4-1(a), Pine Hill Flannelbush, and specifically questions the length of monitoring/maintenance and if irrigation will be required. The commenter incorrectly notes monitoring and maintenance will only last two years. Monitoring will occur every six months for the first two years. If transplantation does not meet success criteria, monitoring and maintenance will continue until those success criteria are achieved (see Appendix F.4, section 6.3.2). Irrigation is not prevented and could be utilized if determined necessary to ensure the success of transplantation. The monitoring and maintenance will continue until success criteria are achieved. If those success criteria cannot be achieved, the Mitigation Measure 4.4-1(a)(5) provides alternative maintenance transplantation measure to help achieve success criteria.

#### **Response to Comment Ind 522-8**

Please see Response to Comment Ind 522-7.

#### **Response to Comment Ind 522-9**

Please see Response to Comment Ind 522-7. Furthermore, as noted in Response to Comment Agcy 3-5, Mitigation Measure 4.4-1(b) now requires the Project Applicant to obtain an Incidental Take Permit (ITP) from CDFW for project-related impacts to Pine Hill Flannelbush. During the consultation process with CDFW, the Habitat Management Plan, included as an appendix to the DEIR, may be revised as required by CDFW, and must be approved by CDFW prior to implementation. The measures provided in the EIR are minimum measures, and additional measures may be required by CDFW to be included in the HMP during consultation.

#### **Response to Comment Ind 522-10**

The commenter asserts that the biological mitigation measures are inadequate but does not specify how they are inadequate. Please Master Response 1 and the above responses to comments.





Individual Letter 523

	<p>Hello Mr. Kelly</p>
<b>Ind 523-1</b>	<p>I was reading this at the Planning Commission Public Hearing on March 22 when I ran up against my 3 minute deadline. The section in italics is a repeat, just to give context to the point I didn't get to make below it.</p> <ul style="list-style-type: none"><li><i>This DEIR mistakenly concludes that a few more decibels of noise in an area that is greater than what is currently tolerated seems acceptable with some "mitigating measures." Decibels are measured on a logarithmic scale, like the Richter earthquake scale, where one numeral higher on the scale is tenfold the magnification. This makes the numbers presented in this DEIR even more misleading from the start.</i></li></ul>
<b>Ind 523-2</b>	<p>...The damage to people and to animals by noise pollution of a few decibels-- at 10 times per decimal increase-- are not insignificant. Much research has been done on the effects of noise pollution and proven that it causes stress to both humans and wildlife. In humans stress causes compromised immune systems and emotional harm, both of which can lead to illness. Noise pollution also causes physical damage to wildlife, including interrupting breeding and migration. This cannot be dismissed by manipulating simple arithmetic.</p> <ul style="list-style-type: none"><li>Rise Gold's funded DEIR claims that noise will actually reduce over time, because it will be a smaller percentage of the overall noise caused by an increase of traffic volume over the years. How is that for misguided logic?!</li></ul>
<b>Ind 523-3</b>	<ul style="list-style-type: none"><li>As a specialist in wetland ecology, I am galled by the proposal to cap over most of the fresh water marshes on these two sites, or otherwise significantly alter them. California's wetlands have already been reduced by 92% since the gold rush. Let's not allow Rise Gold to rush into decimating any more of these fragile habitats, home to rare and threatened species of reptiles, amphibians, birds, and plants.</li></ul>
<b>Ind 523-4</b>	<ul style="list-style-type: none"><li>There are many such examples of minimization of impact in the Idaho-Maryland DEIR. This report denies the <b>cumulative impacts</b> of almost all of these.</li></ul>
<b>Ind 523-5</b>	<p>Best case scenario, what this DEIR minimizes and denies is incomplete and the proposed mitigations, when there are any, are inadequate start to finish of the document. Worst case scenario, the effects of allowing this mine to reopen are likely to be catastrophic even without unexpected accidents that can occur. History has shown this to be true with other mines in the area, such as the Lava Cap Mine, and the San Juan Mine.</p>

Thank you,

*Marion Blair*

12183 Sunset Avenue, Grass Valley 95945



## **INDIVIDUAL LETTER 523: MARION BLAIR**

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### **Response to Comment Ind 523-1**

As discussed on page 5 of the project's Noise and Vibration Assessment (DEIR Appendix L), audibility is very subjective and can vary from person to person. Thus, audibility is not used as a significance criterion in evaluating noise impacts. In addition, a noise source can be audible without a substantial increase in ambient noise levels occurring. It is important to note that residents in the general project area, including the City of Grass Valley, are currently exposed to noise from existing trucks on the area roadway network, as well as noise from automobile traffic, all of which are audible. An extensive ambient noise survey was undertaken for the project's noise impact assessment to establish baseline ambient conditions to ensure that any identified substantial noise level increases above those ambient conditions would be identified as significant and that appropriate noise mitigation measures would be developed.

The SoundPlan Model was used to predict noise levels. The SoundPlan Model has been used worldwide for 30 years and is internationally recognized by the acoustical consulting profession as being a state-of-the-art noise prediction model. In addition, the noise technical study (see Appendix L) that used the SoundPlan to conduct its analysis and identify potential project impacts, was peer reviewed by a County retained noise consultant who concurred with the use of this modeling software. The SoundPlan model used to quantify the transmission of sound from the project area to the surrounding areas accounts for topography, atmospheric conditions, ground cover, shielding by intervening buildings, noise attenuation provided by building walls and ceilings, and vegetation (see pages 5-7 of DEIR Appendix L). Local topographic survey data was imported to develop a 3-dimensional model of not only the project site but the surrounding neighborhoods as well. (DEIR 4.10-23.)

The standards of significance utilized for this DEIR were the County's adopted noise standards, the CEQA Guidelines and Appendix G criteria, which are intended to protect residents and other sensitive receptors from the harmful and annoying effects of noise and vibration. These standards are consistent with standards recommended by the State of California for the development of community noise control ordinances. Although the noise evaluation did present information pertaining to the maximum noise generation of the project, as required by County policy, it also evaluated the effects of the project in terms of the County's average hourly noise level criteria and additionally evaluated potential impacts relative to baseline ambient noise conditions, per CEQA requirements. DEIR section 4.10.4 provides a comprehensive explanation of the standards of significance used to identify project impacts, the methodology used to make this assessment, analysis of potential impacts, and recommended mitigation measures to reduce identified impacts to a less than significant level.

The commenter complains that the logarithmic method used to quantify noise in the DEIR is misleading; however, use of the decibel scale is the widely accepted standard measurement method for noise, and is fully explained in Section 4.10.2 of the DEIR. In addition, the potential effects of noise on wildlife are addressed in Chapter 4.4, Biological Resources, of the DEIR, starting on page 4.4-74.

### **Response to Comment Ind 523-2**

Impact 4.10-2 of the DEIR analyzed project traffic noise including onsite traffic (i.e., engineered fill placement) and off-site traffic noise (i.e., hauling material to Centennial Industrial Site.) The County General Plan Noise Element and Noise Ordinance do not have a specific policy or standard for assessing noise impacts associated with increases in off-site ambient noise levels



resulting from project-generated traffic on public roadways. As a result, the Noise and Vibration Assessment (DEIR Appendix L) and DEIR impact analysis used Federal thresholds for assessing the significance of project-related increases in off-site heavy truck traffic using federal research conducted by the Federal Interagency Commission on Noise (FICON). Based on this analysis, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 has been required to reduce this impact to a less than significant level.

The commenter also asserts that the DEIR is misleading because it states that project traffic noise will reduce as a percentage of overall ambient noise over time. As stated in the DEIR “future traffic volumes on the project area roadways would increase over time relative to existing levels due to general growth of the region. However, the project-generated truck traffic would remain constant, and would not increase over time. As a result, the incremental contribution to overall traffic noise levels resulting from the project would decrease over time.” (DEIR p. 4.10-60.) For example, East Bennett Road, west of Brunswick Road, currently carries approximately 1,486 vehicles, and the associated noise level is 52.5 dBA. With the project contribution of 111 trucks, the noise level is expected to increase to 54.8 dBA, for a project-related change of 2.3 dB. However, if future traffic levels from cumulative development throughout the region were to increase by ten percent to 1,635 vehicles per day, and the project-related traffic remains at 111 trucks, the total transportation noise level would be 55.0 dBA, but the project-related change diminishes to 2.1 dBA. As a generic example, one truck on a road that carries 1 car per day, would be quite noticeable and would be the primary noise generator. However, if the traffic increased to 100 cars per day, or say 1,000 per day, the single truck's contribution to total noise would diminish substantially.

### **Response to Comment Ind 523-3**

A majority of the wetlands on the Centennial Industrial Site will be removed as a result of the Centennial M-1 Remedial Action Plan project. Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA. The additional wetland impacts associated with engineered fill placement at the Centennial Industrial Site were analyzed in DEIR Impact 4.4-3 and mandatory mitigation reducing the impact to a less than significant level is provided in Mitigation Measure 4.4-3(a-d).

### **Response to Comment Ind 523-4**

CEQA Guidelines section 15130 requires an EIR to discuss cumulative impacts of a proposed project. Cumulative impacts are considered impacts created because of the combination of the proposed project with reasonably foreseeable future projects. DEIR section 5.3 summarizes the cumulative impacts analysis, and each resource analysis includes an analysis of cumulative impacts specific to that resource. The commenter alleges that there are many examples of minimization of impact in the DEIR, but provides no specific examples. Please see Master Response 1.

### **Response to Comment Ind 523-5**

Please see Master Response 1.



**Individual Letter 524**

Marisa Jackson-Kinman (AKA Marisa Laursen)

[myfriendmarisa@gmail.com](mailto:myfriendmarisa@gmail.com)  
909.896.2004

March 29, 2022

Matt Kelly, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959

Dear Matt,

Thank you for taking great care in considering what the true potential of the Rise Gold Mine would mean for our rural community.

**Ind 524-1**

I have spent much time reviewing and assessing the DEIR report and considering the impact on the quality of our lives here, and find it challenging to adequately express just how strongly I oppose this affront to our community. The impacts are potentially huge, serious, and long term.

I chose to move to this community for its rural, peaceful way of life. It's beautiful scenery. The silence. The nighttime star display. The fact that it offers what my previous life in crowded, noisy, traffic-filled Southern California did not offer. The Rise Gold Mine would negatively alter the nature of our community in countless ways, many of which would only be truly recognized if this project were to come to fruition.

More specifically, here are the bullet points of some of my chief concerns and the inadequacy of the DEIR report to address them satisfactorily:

**Ind 524-2**

**1) Surface and groundwater water impacts are inadequately addressed in the DEIR report.**

- a) Deir only has plans to address 39 wells, when there are potentially hundreds affected
- b) What impact would this have on the already extremely high forest fire hazard, and especially when we are in the midst of a multi-year drought?

**Ind 524-3**

**2) Visual impacts are unmitigated in the report**

- a) There would be what amounts to a skyscraper in our beautiful forest; engineered backfill off Brunswick that is 40+ feet tall; deforestation with minimal replanting of trees, and only along road corridors; the pristine nature of our dark nighttime sky would be gone.

**Ind 524-4**

**3) Traffic impacts would be huge, unmitigated, unavoidable**

**Ind 54-5**

**4) The mine runs counter to the need to reduce greenhouse gas emissions**





	a) As the residents of Nevada County strive to live in a more ecologically-conscious manner, the progress made would be obliterated by the additional greenhouse emissions by the mine.
Ind 524-6	5) <b>Explosives</b> would be brought to our community as they are transported, stored, and utilized on the mine site, bringing noise and the potential for accidents which could result in calamity.
Ind 524-7	6) <b>Air quality impact is inadequate in the report</b> a) We already score an F rating in terms of air quality, and mine emissions would only serve to worsen it.
Ind 524-8	7) <b>Clean-up of the Centennial site not included in the report</b>
Ind 524-9	I live near the intersection of Greenhorn and Brunswick, and would be facing this monstrosity each and every day. What impact will that have on our property values?
Ind 524-10	Why would I want to continue living here, with the noise, visual impacts, water impact, traffic, etc.? And why would others want to move to our community and be faced with these same issues? This is not why people move to our community and what gives it the charm that it is known for.
Ind 524-11	<b>And if this project is approved, what would stop other mines from deciding that they can come here and do the same?</b>
Ind 524-12	Rise Mine already went bankrupt once. How can we know definitely that they wouldn't scar our land and then go bankrupt, leaving a mess behind for future generations to deal with?
	<b>We need to consider who we are as a community. Is this mine truly in alignment with our rural lifestyle? Is this what we as a community want for our future? I say a resounding NO!</b>
Ind 524-13	Let's consider more suitable options for the land, in alignment with who we are as a community, making use of the natural setting that is in harmony with nature while creating eco-friendly jobs.
	Sincerely,
	<b>Marisa Jackson-Kinman (Laursen)</b> 12888 Lost Lake Road Grass Valley, CA 95945





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## **INDIVIDUAL LETTER 524: MARISA JACKSON-KINMAN**

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### **Response to Comment Ind 524-1**

The commenter's opposition of the project is noted for decision makers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Responses to specific comments are provided below.

### **Response to Comment Ind 524-2**

The commenter states that the DEIR underestimates the potential number of groundwater wells impacted by the project but does not explain why. The commenter also questions how the project's hydrology impacts will affect wildfire hazards. Regarding impacts to hydrology, the commenter is referred to Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

The project's impacts to wildfire are analyzed in Chapter 4.13 of the DEIR. The commenter is also referred to Master Response 6 - Wildfire Impacts, and Master Response 33 – Groundwater Dependent Vegetation.

### **Response to Comment Ind 524-3**

As noted by the commenter, the DEIR has determined that the project has a significant and unavoidable aesthetics impact, in part due to the engineered fill piles. (DEIR, 4.1-15.)

### **Response to Comment Ind 524-4**

The commenter states that traffic impacts would be "huge, unmitigated, [and] unavoidable" but does not provide any additional detail. Traffic impacts are analyzed in Chapter 4.12 of the DEIR. With the exception of two intersection impacts, one related to LOS (SR 174/Brunswick Road) and the other related to queueing (Brunswick Road/Sutton Way), all transportation impacts would be less-than-significant after mitigation required in the DEIR.

### **Response to Comment Ind 524-5**

The commenter is concerned with the project's GHG emissions. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

### **Response to Comment Ind 524-6**

The commenter is concerned about the project's use of explosives. Explosives transport, storage, and use have been found to be a less than significant impact after mitigation. The commenter is referred to Chapter 4.7 of the DEIR and Master Response 10 – Explosives, Reagents, and Brunswick Fill.

### **Response to Comment Ind 524-7**

The commenter states that the project would worsen the air basin's already poor quality. The commenter is referred to Master Response 18 - Air Quality Thresholds.



**Response to Comment Ind 524-8**

The commenter states that the cleanup of the Centennial Site is not included in the DEIR. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

**Response to Comment Ind 524-9**

The commenter is concerned with the project's impact on property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

**Response to Comment Ind 524-10**

The commenter expresses general concerns regarding the project but offers no information about those impacts to formulate a specific response. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

**Response to Comment Ind 524-11**

The commenter is concerned that approval of the project may lead to other mining projects being proposed in the County. Growth inducement is addressed in Chapter 5 of the DEIR and found to be less than significant. The commenter is also referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

**Response to Comment Ind 524-12**

The commenter references the Project Applicant's prior mining projects. The commenter is referred to Master Response 3 - Operator Responsibility.

**Response to Comment Ind 524-13**

The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.



**Individual Letter 525**



February 16, 2022

Nevada County Planning Commission  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95949

**Ind 525-1**

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Green,

I the undersigned, a resident and registered voter in Nevada County, am opposed to the reopening of the Idaho Maryland Mine by Rise Gold Corporation. Regarding the vote to approve or not approve the project, in addition to reviewing the Environmental Impact Report I hope you will also consider the serious concerns I and many Nevada County residents have to allowing the mine be reopened particularly by a company represented by a foreign citizen, Ben Mossman, who has no investment in the wellbeing of Nevada County, its businesses, infrastructure or citizens. In addition that person and mining company and mine he was involved with in Canada has multiple serious charges for environmental damage and endangering the health of Canadian citizens during mining operations and after abandoning that project and attempting to escape liability using that countries bankruptcy laws.

**Ind 525-2**

Other reasons I oppose the mine include the following:

- Introduction of toxic substances into the air and water within and adjacent to the cities of Grass Valley and Nevada City many of which substances are likely to remain environmental and health problems for decades.

**Ind 525-3**

- 24 hour heavy mining equipment traffic on over city and county roads posing the risk of blocking evacuation routes in the event of emergencies such as wild fire.

**Ind 525-4**

- Extreme wear and tear of infrastructure, including road maintenance, drainage, water quality, air quality, and many other problems related to the already strained infrastructure of Nevada County specifically within 50 miles or so of Nevada City, Grass Valley, and other local communities within and outside of Nevada County.

**Ind 525-5**

- Interference with recreation and tourist access to recreational areas.

**Ind 525-6**

- Opening the mine will require the pumping of millions of cubic feet of ground water bringing the danger of drying out residential wells and other sources of water for residents and businesses.

**Ind 525-7**

- Releasing contaminates into ground water and pumping contaminated water into rivers and streams contaminating the water for millions of people downstream.



**Ind 525-8**

- Continuous underground blasts potentially weakening old, abandoned mine tunnels and shafts possibly creating unforeseeable sink holes and other soils problems contributing to foundation problems for residential and business building, roads, trails, and creating dangerous conditions for recreational use of trails and other recreational areas.

**Ind 525-9**

- Potential damage to wildlife habitat and forest environments.

**Ind 525-10**

- Reducing availability of water available for fighting fires.

**Ind 525-11**

- Claims of jobs and other benefits made by Rise Gold do not bear up to scrutiny. Rise Gold's CEO's demonstrated habit of litigating itself out of responsibility for damage to local communities and renegeing on contractual requirements and various promises and inability to substantiate other claims of economic benefit do not instill confidence.

**Ind 525-12**

As an older citizen, property owner, disabled person and advocate for persons with disabilities I am also concerned about the accessibility and other hazardous conditions opening the mine may cause for me and the many other disabled and older citizens residing in this county.

Because of these, and many other reasons, it is my opinion that it would be fiscally and morally irresponsible to approve the proposed mining project.

Sincerely yours,



Mark Fenicle

11612 POLARIS DR., GRASS VALLEY, CA 95949



---

## **INDIVIDUAL LETTER 525: MARK FENICLE**

---

### **Response to Comment Ind 525-1**

This comment is introductory in nature. The commenter's opposition to the project and concern regarding the Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 525-2**

The commenter states that the project will release toxic substances into the air and water but does not give specific information on which to formulate a specific response. The DEIR found that impacts to air and water quality would be less than significant after mitigation. The commenter is referred to Chapters 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and 4.8 (Hydrology and Water Quality) of the DEIR.

### **Response to Comment Ind 525-3**

The commenter states that the project-related traffic would impede an evacuation in the area. The commenter is referred to Master Response 5 - Evacuation Zones.

### **Response to Comment Ind 525-4**

The commenter states that the project would strain the County's infrastructure. The project's impacts to public infrastructure are analyzed in Chapter 4.8 (Hydrology and Water Quality), 4.11 (Public Services and Utilities), and 4.12 (Transportation). For example, the Project Applicant would be required to enter into agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road. (DEIR, Mitigation Measure 4.12-6(c).)

### **Response to Comment Ind 525-5**

The commenter states that the project will interfere with recreation and tourist access to recreational areas. The project would not interfere with recreation or access to recreational areas. The commenter is referred to Chapters 4.11 and 4.12 of the DEIR. To the extent the commenter believes the project will impact the tourism industry, the commenter is referred to Master Response 2 – Social and Economic Impacts.

### **Response to Comment Ind 525-6**

The commenter states that the project will have an adverse impact on private wells. The commenter is referred to Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 525-7**

The commenter states that the project will have adverse impacts on water quality. The commenter is referred to Chapter 4.8 of the DEIR, and Master Response 35 - Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 525-8**

The commenter states that the project's underground blasting may result in sinkholes or a collapse on the surface. The commenter is referred to Master Response 29 - Near Surface Workings.





**Response to Comment Ind 525-9**

The commenter states that the project will adversely impact wildlife. The project's impact to wildlife habitat is less than significant after mitigation. The commenter is referred to Chapter 4.4 of the DEIR.

**Response to Comment Ind 525-10**

The commenter states that the project will result in reduced water supplies for firefighting. The project does not reduce availability of water for fighting fires. The commenter is referred to Chapters 4.8 and 4.11 of the DEIR.

**Response to Comment Ind 525-11**

The commenter claims that the DEIR overstates the project's economic benefits and references the Project Applicant's prior mining projects. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.

**Response to Comment Ind 525-12**

The commenter is concerned about accessibility issues and other hazards created by the project for disabled citizens. The commenter is referred to responses to specific comments above and to Master Response 1 - Non-EIR/Administrative Issues.



**Individual Letter 526**

Dist 4

**RECEIVED**

FEB 17 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

February 16, 2022

Nevada County Board of Supervisors  
950 Maidu Avenue, Suite 200  
Nevada City, CA 95949

Honorable Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, Hardy Bulluck

I the undersigned, a resident and registered voter in Nevada County, am opposed to the reopening of the Idaho Maryland Mine by Rise Gold Corporation. Regarding the vote to approve or not approve the project, in addition to reviewing the Environmental Impact Report I hope you will also consider the serious concerns I and many Nevada County residents have to allowing the mine be reopened particularly by a company represented by a foreign citizen, Ben Mossman, who has no investment in the wellbeing of Nevada County, its businesses, infrastructure or citizens. In addition that person and mining company and mine he was involved with in Canada has multiple serious charges for environmental damage and endangering the health of Canadian citizens during mining operations and after abandoning that project and attempting to escape liability using that countries bankruptcy laws.

Other reasons I oppose the mine include the following:

- Introduction of toxic substances into the air and water within and adjacent to the cities of Grass Valley and Nevada City many of which substances are likely to remain environmental and health problems for decades.
- 24 hour heavy mining equipment traffic on over city and county roads posing the risk of blocking evacuation routes in the event of emergencies such as wild fire.
- Extreme wear and tear of infrastructure, including road maintenance, drainage, water quality, air quality, and many other problems related to the already strained infrastructure of Nevada County specifically within 50 miles or so of Nevada City, Grass Valley, and other local communities within and outside of Nevada County.
- Interference with recreation and tourist access to recreational areas.
- Opening the mine will require the pumping of millions of cubic feet of ground water bringing the danger of drying out residential wells and other sources of water for residents and businesses.
- Releasing contaminates into ground water and pumping contaminated water into rivers and streams contaminating the water for millions of people downstream.

Ind 526-1



- Continuous underground blasts potentially weakening old, abandoned mine tunnels and shafts possibly creating unforeseeable sink holes and other soils problems contributing to foundation problems for residential and business building, roads, trails, and creating dangerous conditions for recreational use of trails and other recreational areas.
- Potential damage to wildlife habitat and forest environments.
- Reducing availability of water available for fighting fires.
- Claims of jobs and other benefits made by Rise Gold do not bear up to scrutiny. Rise Gold's CEO's demonstrated habit of litigating itself out of responsibility for damage to local communities and renegeing on contractual requirements and various promises and inability to substantiate other claims of economic benefit do not instill confidence.

As an older citizen, property owner, disabled person and advocate for persons with disabilities I am also concerned about the accessibility and other hazardous conditions opening the mine may cause for me and the many other disabled and older citizens residing in this county.

Because of these, and many other reasons, it is my opinion that it would be fiscally and morally irresponsible to approve the proposed mining project.

Sincerely yours,



Mark Fenicle

11612 POLARIS DR., GRASS VALLEY, CA 95949



## **INDIVIDUAL LETTER 526: MARK FENICLE**

---

### **Response to Comment Ind 526-1**

This letter is a duplicate copy of Individual Letter 525. Please see comments and responses in Individual Letter 525.



**Individual Letter 527**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Wednesday, January 19, 2022 4:00 PM  
**To:** Idaho MMEIR

**CAUTION:** This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**Ind 527-1**

NO MINE!  
I will be in attendance for the DEIR meeting to oppose this attempt to ruin my community.  
Mark Johnson





## **INDIVIDUAL LETTER 527: MARK JOHNSON**

---

### **Response to Comment Ind 527-1**

Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 528**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 4:57 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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**From:** mark johnson <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
**Date:** Mon, Apr 4, 2022 at 4:36 PM  
**Subject:**  
**To:** <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

**Ind 528-1**

FALSE INFORMATION CONCERNING EVERY ITEM IN THIS DEIR. IT MUST BE DONE OVER, IN A COMPETENT MANNER.  
NO MINE!!!



## **INDIVIDUAL LETTER 528: MARK JOHNSON**

---

### **Response to Comment Ind 528-1**

The comment expresses a general opinion that the DEIR is inadequate, but does not provide specific examples that would allow for a detailed response. Please see Master Response 1.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 529**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 5:01 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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From: **mark johnson** <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
Date: Mon, Apr 4, 2022 at 4:55 PM  
Subject: Fwd: DEIR  
To: <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

**Ind 529-1**

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From: **mark johnson** <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
Date: Mon, Apr 4, 2022 at 4:32 PM  
Subject:  
To: <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

NO CENTENNIAL SITE DEIR???  
NO MINE!!!



## **INDIVIDUAL LETTER 529: MARK JOHNSON**

---

### **Response to Comment Ind 529-1**

The comment does not directly address the adequacy of the DEIR. Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.





**Individual Letter 530**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 4:57 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

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**From:** mark johnson <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
**Date:** Mon, Apr 4, 2022 at 4:34 PM  
**Subject:**  
**To:** <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

EXTREME TAXATION OF OUR ELECTRICAL GRID?  
NO MINE!!!

**Ind 530-1**



## **INDIVIDUAL LETTER 530: MARK JOHNSON**

---

### **Response to Comment Ind 530-1**

The comment does not directly address the adequacy of the DEIR. Energy is addressed in Chapter 4.3 of the DEIR.



**Individual Letter 531**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 5:00 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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**From:** mark johnson <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
**Date:** Mon, Apr 4, 2022 at 4:54 PM  
**Subject:** Fwd: DEIR  
**To:** <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

Ind 531-1

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**From:** mark johnson <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
**Date:** Mon, Apr 4, 2022 at 4:31 PM  
**Subject:**  
**To:** <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

ASBESTOS? MESOTHELIOMA!  
NO MINE!!!



## **INDIVIDUAL LETTER 531: MARK JOHNSON**

---

### **Response to Comment Ind 531-1**

The comment does not directly address the adequacy of the DEIR. Asbestos is addressed in detail in Chapter 4.3 of the DEIR. Please also see Master Response 22 – Conservatism used for Asbestos Assessment.



**Individual Letter 532**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 4:55 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

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From: **mark johnson** <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
Date: Mon, Apr 4, 2022 at 4:32 PM  
Subject:  
To: <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

NO CENTENNIAL SITE DEIR???  
NO MINE!!!

**Ind 532-1**





## **INDIVIDUAL LETTER 532: MARK JOHNSON**

---

### **Response to Comment Ind 532-1**

The comment does not directly address the adequacy of the DEIR. Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.



**Individual Letter 533**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 5:00 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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From: **mark johnson** <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
Date: Mon, Apr 4, 2022 at 4:53 PM  
Subject: Fwd: DEIR  
To: <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

**Ind 533-1**

Did not get s receipt  
----- Forwarded message -----  
From: **mark johnson** <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
Date: Mon, Apr 4, 2022 at 4:30 PM  
Subject:  
To: <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

SAVE MY WATER WELL!  
NO MINE!!!



## **INDIVIDUAL LETTER 533: MARK JOHNSON**

---

### **Response to Comment Ind 533-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 534**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 4:55 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

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From: **mark johnson** <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
Date: Mon, Apr 4, 2022 at 4:31 PM  
Subject:  
To: <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

ASBESTOS? MESOTHELIOMA!  
NO MINE!!!

**Ind 534-1**



## **INDIVIDUAL LETTER 534: MARK JOHNSON**

---

### **Response to Comment Ind 534-1**

The comment does not directly address the adequacy of the DEIR. Asbestos is addressed in detail in Chapter 4.3 of the DEIR. Please also see Master Response 22 – Conservatism used for Asbestos Assessment.





**Individual Letter 535**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 4:59 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

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did not get s receipt

----- Forwarded message -----

**From:** mark johnson <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
**Date:** Mon, Apr 4, 2022 at 4:53 PM  
**Subject:** Fwd: DEIR  
**To:** <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

Did not get a receipt

----- Forwarded message -----

**From:** mark johnson <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
**Date:** Mon, Apr 4, 2022 at 4:29 PM  
**Subject:**  
**To:** <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

The sound projections for the machinery operated on site of this debacle (Idaho-Maryland Mine) are ludicrous and insulting to anyone, such as I, that has operated heavy machinery or that will live near the destructive enterprise. THE DEIR MUST BE COMPLETELY REVAMPED, IN EVERY WAY. NO MINE!!!

**Ind 535-1**



## **INDIVIDUAL LETTER 535: MARK JOHNSON**

---

### **Response to Comment Ind 535-1**

The comment expresses a general opinion that the sound projections in the noise analysis, completed as part of the DEIR, are inadequate, but does not provide specific examples that would allow for a detailed response. The noise analysis was independently peer reviewed by the County's third party consultant, Saxelby Acoustics, who requested certain revisions to the study prepared for the applicant by Bollard Acoustical Consultants. Saxelby subsequently determined that the revised noise analysis was adequate for CEQA purposes. In addition, based on the noise analysis, none of the individual or combined activities associated with long-term operations of the proposed project are projected to generate noise in excess of the applicable noise standards. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 is included out of an abundance of caution to ensure satisfaction with such standards and to reduce the potential for annoyance resulting from the proposed project to the maximum extent feasible. MM 4.10-2 requires implementation of an ongoing comprehensive noise monitoring program under County oversight. If operational noise levels are found to exceed the applicable County noise standards, the County shall require cessation of the mine operations until additional engineering controls can be implemented.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 536**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 4:54 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

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Did not get s receipt

----- Forwarded message -----

**From:** mark johnson <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
**Date:** Mon, Apr 4, 2022 at 4:30 PM  
**Subject:**  
**To:** <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

SAVE MY WATER WELL!  
NO MINE!!!

**Ind 536-1**



## **INDIVIDUAL LETTER 536: MARK JOHNSON**

---

### **Response to Comment Ind 536-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 537**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 4:59 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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**From:** mark johnson <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
**Date:** Mon, Apr 4, 2022 at 4:51 PM  
**Subject:** Fwd: DEIR  
**To:** <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

Did not get a receipt

----- Forwarded message -----

**From:** mark johnson <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
**Date:** Mon, Apr 4, 2022 at 2:56 PM  
**Subject:**  
**To:** <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

The DEIR for the Idaho/Maryland Mine is flawed and extremely inadequate. This incomplete report must take all negative factors into consideration and it does not.

The recommendation to the BOS must be a negative recommendation.

The loss of value to my property will be substantial and unmitigatable. The traffic increase will be substantial and unmitigatable. The pollution to both the air we breathe and the water we drink is foreseen as substantial and unmitigatable.

PROTECT MY PROPERTY VALUES.

PROTECT MY WELL.

PROTECT OUR AIR..

PROTECT WOLF CREEK AND EVERYWHERE IT FLOWS.

NO MINE!!!

Mark Johnson

Grass Valley, Ca.

**Ind 537-1**





## **INDIVIDUAL LETTER 537: MARK JOHNSON**

---

### **Response to Comment Ind 537-1**

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values is outside the scope of CEQA – Please see Master Response 2. Regarding well concerns, please see Master Responses 14 and 15.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 538**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 4:53 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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Did not get a receipt

----- Forwarded message -----

**From:** mark johnson <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
**Date:** Mon, Apr 4, 2022 at 4:29 PM  
**Subject:**  
**To:** <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

**Ind 538-1**

The sound projections for the machinery operated on site of this debacle (Idaho-Maryland Mine) are ludicrous and insulting to anyone, such as I, that has operated heavy machinery or that will live near the destructive enterprise. THE DEIR MUST BE COMPLETELY REVAMPED, IN EVERY WAY. NO MINE!!!



**INDIVIDUAL LETTER 538: MARK JOHNSON**

---

**Response to Comment Ind 538-1**

Please see Response to Comment Ind 535-1.



**Individual Letter 539**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 4:52 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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Did not get a receipt

----- Forwarded message -----

**From:** mark johnson <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
**Date:** Mon, Apr 4, 2022 at 2:56 PM  
**Subject:**  
**To:** <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

**Ind 539-1**

The DEIR for the Idaho/Maryland Mine is flawed and extremely inadequate. This incomplete report must take all negative factors into consideration and it does not.

The recommendation to the BOS must be a negative recommendation.

The loss of value to my property will be substantial and unmitigatable. The traffic increase will be substantial and unmitigatable. The pollution to both the air we breathe and the water we drink is foreseen as substantial and unmitigatable.

PROTECT MY PROPERTY VALUES.

PROTECT MY WELL.

PROTECT OUR AIR..

PROTECT WOLF CREEK AND EVERYWHERE IT FLOWS.

NO MINE!!!

Mark Johnson

Grass Valley, Ca.



**INDIVIDUAL LETTER 539: MARK JOHNSON**

---

**Response to Comment Ind 539-1**

Please see Response to Comment Ind 537-1.





**Individual Letter 540**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 4:58 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

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----- Forwarded message -----

From: **mark johnson** <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
Date: Mon, Apr 4, 2022 at 4:56 PM  
Subject: Fwd: DEIR  
To: <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

did not get a receipt

----- Forwarded message -----

From: **mark johnson** <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
Date: Mon, Apr 4, 2022 at 4:36 PM  
Subject:  
To: <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

FALSE INFORMATION CONCERNING EVERY ITEM IN THIS DEIR. IT MUST BE DONE OVER, IN A COMPETENT MANNER.  
NO MINE!!!

**Ind 540-1**



## **INDIVIDUAL LETTER 540: MARK JOHNSON**

---

### **Response to Comment Ind 540-1**

The commenter generally asserts that there is false information throughout the DEIR but provides no specific examples to substantiate this broad-sweeping claim. Thus, no specific response is possible nor required. Please see Master Response 1.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 541**

**From:** mark johnson <bigwoody555@gmail.com>  
**Sent:** Monday, April 4, 2022 5:02 PM  
**To:** Idaho MMEIR  
**Subject:** Fwd:

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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did not get a receipt

----- Forwarded message -----

From: **mark johnson** <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
Date: Mon, Apr 4, 2022 at 4:56 PM  
Subject: Fwd: DEIR  
To: <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

Did not get a receipt

----- Forwarded message -----

From: **mark johnson** <[bigwoody555@gmail.com](mailto:bigwoody555@gmail.com)>  
Date: Mon, Apr 4, 2022 at 4:34 PM  
Subject:  
To: <[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)>

EXTREME TAXATION OF OUR ELECTRICAL GRID?  
NO MINE!!!

**Ind 541-1**



## **INDIVIDUAL LETTER 541: MARK JOHNSON**

---

### **Response to Comment Ind 541-1**

The comment does not directly address the adequacy of the DEIR. Energy is addressed in Chapter 4.3 of the DEIR.



Individual Letter 542

Ind 527-1

**don't**  
**I support re-opening the Idaho-Maryland Mine**

list 4

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Mark & Dawna Johnson

Address 11130 Orion Way ZIP 95949

Phone 530 273 3386

Email Address bmergirl61@gmail.com





## **INDIVIDUAL LETTER 542: MARK AND DAWNA JOHNSON**

---

### **Response to Comment Ind 542-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 543

IDAHO-MARYLAND MINE PROJECT  
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Mark Johnson

Address: GRASS VALLEY, CA.

Organization (if applicable): \_\_\_\_\_

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

**Matt Kelley, Senior Planner**  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 95959-8617  
Idaho.MMEIR@co.nevada.ca.us

THE D.E.I.R. FOR THE IDAHO-MARYLAND MINE RE-OPENING IS  
WOE FULLY INADEQUATE!

NO MINE!

RECEIVED  
MAR 24 2022  
NEVADA COUNTY  
PLANNING DEPARTMENT

Ind 543-1



## **INDIVIDUAL LETTER 543: MARK JOHNSON**

---

### **Response to Comment Ind 543-1**

The comment expresses a general opinion that the DEIR is woefully inadequate, but does not provide specific examples that would allow for a detailed response.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 544**

**From:** Mark Machado <markmconsult@gmail.com>  
**Sent:** Thursday, March 31, 2022 3:20 PM  
**To:** Idaho MMEIR  
**Cc:** Brian Foss  
**Subject:** Comments on Rise Gold DEIR  
**Attachments:** Rise Gold DEIR comments - Machado.pdf

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**Do not click links or open attachments unless** you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Dear Mr. Kelley:

Please see my comments relating to the DEIR for Rise Gold attached.

As a young, professional engineer, I had the opportunity to be a consultant on the drafting of more than one large EIR and as a developer, have generated my own EIR on a small project. Based on my somewhat limited experience, but experience nevertheless, I have found the whole EIR process to be inherently bias, to some unfortunate degree.

Bias in not only the process of vendor selection, where the developer is involved, but also who and how consultants and experts are selected and ultimately, who pays for it all.

I feel the main task of the authority having jurisdiction, in this case the County of Nevada, is to not only see that the generation of an EIR is complete and thorough, but in the process, reduce the appearance of that inherent bias to a level completely overshadowed by the quality of the finished EIR product.

I feel the County is up to the task and I wish you well in the endeavor.....for the sake of the community I cherish.

Thanks  
Mark

P.S. Would you mind providing me an indication you received this email and attachment? Thx.

**Ind 544-1**



Mark A. Machado P.E.

13640 Kantorbery Court  
Grass Valley, CA. 95945  
530.559.5035 cell  
[markmconsult@gmail.com](mailto:markmconsult@gmail.com)

3/31/2022

Matt Kelley, Senior Planner  
Nevada County Planning  
950 Maidu Avenue, Suite 170  
Nevada City, CA. 95959-7902

**RE: Comments on DEIR – Rise Gold/Idaho-Maryland Mine project**

Dear Mr. Kelley:

**Ind 544-2**

I offer the following as my comments and/or concerns about the DEIR currently under consideration by the County. The comments are not all-inclusive, but represent my main thoughts on the subject-matter:

**Chapter 4.3 Air Quality:**

**Ind 544-3**

Nevada County currently claims a lung disease rate that's twice the State average. This chapter is wholly inadequate nor properly addresses the exposure to increased levels of asbestos, a naturally occurring substance in serpentine rock. This rock will be blown up, crushed, worked, re-worked, moved, loaded, transported and finally dumped, within 1 mile of downtown Grass Valley, surrounding residential communities and schools. Too many modes and opportunities of airborne asbestos escape for any effective mitigation.

**Chapter 4.8 Hydrology:**

**Ind 544-4**

Totally inadequate. Needs significantly more research, based on experience in California foothill communities. California's water table is dropping. Known fact. Drought is more prevalent than ever before. Moisture levels in our local soils are reducing at rapid levels, leaving our native trees and Ponderosa Pines vulnerable to bark beetle infestation. Protection must be afforded to the 300+ wells that are within the known sphere of influence of the proposed mine location. The potential for the hydrology modeling outlined in the DEIR to be flawed is severe. A recent example is the modeling done for the Siskon Mine on San Juan Ridge and the resulting well

1





↑	<p>tragedy. Many of those surrounding wells are still void and/or of a water quality that makes them effectively, unusable.</p>
Ind 544-5	<p><b>Chapter 4.10 Noise and Vibration:</b></p> <p><i>“Based on the above, operation of the proposed mine is not anticipated to cause damage to structures in the project area”.</i></p> <p><i>“Overall, the proposed project is not anticipated to result in the exposure of persons to or generation of excessive groundborne vibration levels”.</i></p> <p><i>“Two travelling seismographs which can change location depending on the weekly/monthly mining plan”.</i></p> <p>Phases from the Chapters noted are highlighted above. The Chapter as written is wholly inadequate, unreliable and professionally unbelievable. Should comfort be taken that the mine blasting is “not <u>anticipated</u> to cause damage to structures in the project area”? Absolutely not!</p>
Ind 544-6	<p>Should comfort be taken that the “proposed project is not anticipated to result in the exposure of persons to or generation of <u>excessive</u> groundborne vibration levels”? Absolutely not! These are model projections only. Guesstimates. At 500’ below the surface, does any reasonable, rational, critical-thinking individual think vibrations will not be felt from blasting? Granted, it may not “damage” a structure, but how about the mental health of residents attempting to have a relaxing, comforting, nurturing, living experience? Three mild earthquakes in the last 12 months have shown the level of anxiety that can result from such vibration and trembling.</p>
Ind 544-7	<p>Does anyone believe that for the next 80 years “two travelling seismographs.....” will be in use that can “.....change location depending on the weekly/monthly mining plan”? That’s utter nonsense.</p>
Ind 544-8	<p>Address the noise and vibration issue from a human standpoint and the adverse effects any increase in noise and vibration will have on the human psyche and resulting behavior. Get a medical professional involved.</p>
Ind 544-9	<p><b>Chapters 4.3-5.2 Land Use and Population:</b></p> <p>Phases from identified Chapters below.</p> <p><i>“It is anticipated that most of the jobs associated with the project would be filled by residents within the vicinity of the project sites.” Chapter 4.3</i></p> <p><i>“The total workforce when the Idaho-Maryland Mine Project reaches commercial production is estimated at 312 persons. Therefore, the number of jobs required during</i></p>
↓	



operation of the proposed project could draw more people to the area and result in indirect population growth as a result". Chapter 4.9-3

"The majority of workers (268 employees) would work 12 hour shifts with seven days of work followed by seven days of rest. The remaining workforce (44 employees) would work regular eight hour shifts with five days of work followed by the weekend of rest". Chapter 5.2

Ind 544-10

First phase: As a general contractor and developer for over 22 years in this County, I have found an underwhelming number of young people willing to learn a trade, willing to work hard or just be willing to work at all. This has been and continues to be a common issue with all the construction trades in this County, be it carpentry, plumbing, electrical, concrete, etc. Every subcontractor I know has serious difficulty finding people willing to learn a craft and become productive members of our community. Yes, it requires manual labor, just like a hard-rock miner would be expected to perform a task and learn a skill.....except orders of magnitude greater! In today's world, most notably in Nevada County, no high school graduate dreams of becoming a hard-rock miner, except in some immature fantasy fashion. That won't last.

Ind 544-11

Second phase: Yes, the vast majority of the estimated 312-person workforce would be from outside the area and most likely, based on the employment of individuals in the trades here locally, would be immigrants. Not locals. If locals were willing, the "Help Wanted" signs, literally epidemic throughout business storefronts in Grass Valley and Nevada City, would be non-existent or minimal at best.

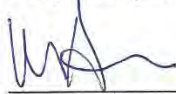
Ind 544-12

Third phase: Again, how many "locals" are going to be willing to work 12-hour shifts, seven days a week, with an alternating week off, 3000'-4000' deep in the bowels of the earth? Really? Take a look at the photos of the miners at the Empire Mine exhibit. It's a new era. My subcontractors can't even find a person willing to learn how to be an electrician or a plumber. They can work above ground, in a healthy environment, with relatively light duty, but still the searches continue with little success.

Ind 544-13

Conclusion: Get real with an honest assessment of the situation. The "jobs" argument is a trojan horse promoted by a "feel good" audience and/or politicians attempting to sound politically correct with unsupported talking points, but, in reality, has no basis in truth. Investigate further. No exceptions.

Respectively submitted,



Mark A. Machado P.E.



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## **INDIVIDUAL LETTER 544: MARK MACHADO**

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### **Response to Comment Ind 544-1**

The commentor states that the DEIR is biased but provides no specifics or evidence. Responses to specific comments are provided below.

### **Response to Comment Ind 544-2**

This comment is introductory in nature. The comment is noted.

### **Response to Comment Ind 544-3**

The commenter states that the DEIR inadequately analyzes asbestos-related impacts. The commenter raises air quality concerns but does not state how the DEIR is inadequate in addressing these impacts. Dust and air pollution concerns are addressed in DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). A Health Risk Assessment was prepared for the project as described on DEIR page 4.3-61. The Project Applicant has prepared an Asbestos, Serpentine, and Ultramafic Rock Management Plan (ASUR) which is designed to exclude asbestos containing material from the engineered fill produced by the project and from rock mined and processed. (DEIR, Appx. E.2.) All mined materials will be tested to ensure asbestos content does not exceed applicable standards and all engineered fill used for surfacing applications would have no detectable asbestos. The commenter is referred to Chapter 4.3 of the DEIR and Master Response 22 - Conservatism of Asbestos Assumptions.

### **Response to Comment Ind 544-4**

The commenter states that the DEIR's Chapter 4.8 (Hydrology and Water Quality) is inadequate because the project will reduce moisture in soils and it underestimates the number of potentially impacted groundwater wells. The commenter is referred to Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 - Drought and Climate Change, and Master Response 33 - Groundwater Dependent Vegetation.

### **Response to Comment Ind 544-5**

As stated on page 4.10-54 of the DEIR, all groundborne vibrations calculated for blasting of both drift round and long-hole stopes, respectively, fall below the USBM recommendations and the levels at which structural damage to buildings is possible. Nonetheless, in order to ensure that actual mining operations would generate vibration levels as expected, a Ground Vibration Monitoring Program is required (Mitigation Measure 4.10-4).

### **Response to Comment Ind 544-6**

The commenter states that the DEIR's finding will regards to groundorne vibrations are projections only and may not be relied upon. As stated on page 4.10-54 of the DEIR, drift development blasts at the shallowest depth considered of 500 feet would be barely perceivable to the general population and undetectable by instrumentation below 900 feet in depth. Larger longhole stoping blasts at the shallowest depth considered of 500 feet would be 0.23 in/s, which is also well below the threshold level of vibration (0.4 in/s) about which less than eight percent of the population complains. The calculated ground vibration is considered insignificant. At depths below 800 feet, the ground vibration becomes unnoticeable to the general population. Untraceable vibration would occur at a depth of approximately 1,500 feet. At depths below 1500 feet, it would be expected that ground vibration would be unnoticeable. Nonetheless, as discussed above, in order to ensure that actual mining operations would generate vibration levels as expected, a Ground Vibration Monitoring Program is required (Mitigation Measure 4.10-4).



**Response to Comment Ind 544-7**

The commenter questions the efficacy of Mitigation Measure 4.10-4, but does not explain why. Mitigation Measure 4.10-4 requires a total of seven seismographs during blasting above the 1,000-foot level and five after blasting above the 1,000-foot level is complete. (DEIR, p. 4.10-58)

**Response to Comment Ind 544-8**

The commenter states the DEIR fails to analyze the noise and vibration impacts on humans. The DEIR considers noise and vibration issues from a human standpoint. The commenter is referred to Chapter 4.10 (Noise and Vibration) of the DEIR which found that noise impacts associated with long-term operation of the mine would be less than significant after mitigation. (DEIR, p. 4.10-31.) One significant and unavoidable noise-related impact was identified, but this is associated with the temporary noise generated during installation of potable water pipeline along East Bennett Road. (DEIR, 4.10-27.)

**Response to Comment Ind 544-9**

The commenter reproduces material from the DEIR. The comment noted.

**Response to Comment Ind 544-10**

The commenter speculates that young people do not want to work at the project. The comment does not address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts. Further, CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.”

**Response to Comment Ind 544-11**

The commenter is referred to Response to Comment Ind 544-10.

**Response to Comment Ind 544-12**

The commenter is referred to Response to Comment Ind 544-10.

**Response to Comment Ind 544-13**

The commenter is referred to Response to Comment Ind 544-10.





**Individual Letter 545**

**From:** Mark Seufert <maseucon@att.net>  
**Sent:** Monday, April 4, 2022 8:31 AM  
**To:** Idaho MMEIR  
**Subject:** Mine Impact on local water ways

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**Ind 545-1**

My name is Mark Seufert , I live in Nevada City with the love of my life , Yvonne " Ronni" Navarro. I am a member of the Gold Country Fly Fishers club which tries to keep our water ways clean and protect the fish habitat to preserve for future generations. Every year we conduct fish surveys on the local creeks , I.E. wolf creek. We have the surveys available if needed. At present , Wolf creek is already a fragile water way, With beaver ponds and slow running water , the german brown trout population is very small but thriving . Not to mention the wetlands the creek creates which supply habitat for birds and animals. The introduction of this mine can only destroy what is left of the creeks we have . The drought is bad enough but I feel this will be the " Nail in the Coffin " for our creeks and streams in the mine area. From what I've read of Rise Gold's Reputation in other countries, They left a wake of destroyed habitat and land behind their last mining expedition and who's to say they will not do the same here. Being a General Contractor, I know how contractors work . I pride myself on my work but sad to say , most contractors are in it for the money .They'll cut corners and do sloppy work to get the most profit. I'm dealing with this exact issue in Paradise helping my sister rebuild from the fire of 2018, Contractors not protecting the soil from concrete run off after cleaning out their concrete trucks or not completing the job and robbing the people of their money. I feel the same will happen here.

**Ind 545-2**

Respectfully, Mark Seufert





## **INDIVIDUAL LETTER 545: MARK SEUFERT**

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### **Response to Comment Ind 545-1**

The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1. Regarding fish comments, please see Master Response 34 – Resident Fish. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 545-2**

Please see Master Response 3 – Operator Responsibility.



**Individual Letter 546**

Dist 1

**RECEIVED**

MAR 09 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

March 5, 2022

Nevada County Board of Supervisors  
950 Maidu Avenue, Suite 200  
Nevada City, CA, 95959

**Ind 546-1**

Re: Rise Gold/Idaho-Maryland Mine Environmental Impact Report

Dear Supervisors:

I am writing in opposition to the approval of Rise Gold's permit to operate the Idaho-Maryland Mine.

Rise Gold has released its draft Environmental Impact Report and claims that it shows that its operations will have no or minimal environmental impacts on our community. It would have us believe that operating a major industrial operation next to businesses, a hospital, nursing homes, and residences will have no effect on our health or quality of life. Of course, such a claim is ridiculous.

**Ind 546-2**

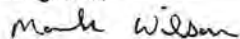
Although I've lived in Nevada County nearly 20 years, I was born and raised near Detroit, Michigan. I worked on the line at one of Chrysler's metal stamping plants. So I'm familiar with the debilitating effect industrial facilities have on a community and its quality of life. There is no such thing as "clean" industry. Noise, diesel exhaust, toxic solvents, trash, polluted streams, and more degrade the surrounding area despite a business's best efforts. And we have no indication that Rise Gold would make its best efforts to protect us.

**Ind 546-3**

It's important to remember that promises made in an EIR are just that—promises. Rise Gold is a penny stock with no experience in mining. The track record of their CEO, Ben Mossman, is horrific. The Canadian government had to shut down his operation in British Columbia in less than two years because of gross safety and environmental violations. Workers were left unpaid and cleanup costs well exceeded those needed to clean up their mess. Today, Mr. Mossman wants to operate a mine in Grass Valley for as long as 80 years, and the human and environmental health of the residents and wildlife of the Grass Valley/Nevada City area are on the line. We all know how unique the natural beauty of this area is. This mine will change it for the worse, forever.

I strongly urge you to turn down Rise Gold's application to operate the Idaho-Maryland mine. Please preserve the beauty and vibrancy so everyone living here can continue to enjoy and prosper in the area for generations to come.

Regards,



Mark Wilson  
11650 Forest View Drive  
Nevada City, CA 95959



## **INDIVIDUAL LETTER 546: MARK WILSON**

---

### **Response to Comment Ind 546-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1.

### **Response to Comment Ind 546-2**

The comment does not address the adequacy of the DEIR. Please see Master Response 1.

### **Response to Comment Ind 546-3**

The mitigation requirements identified in the DEIR are included in the mitigation monitoring and reporting program for the project (Chapter 4 of this Final EIR), and enforceable by state law. Regarding operator concerns and the generally noted concerns related to environmental health, wildlife, and natural beauty of the area, please see Master Responses 1, 2, and 3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 547

March 5, 2022



Nevada County Planning Commission  
950 Maidu Avenue, Suite 170  
Nevada City, CA, 95959

Re: Rise Gold/Idaho-Maryland Mine Environmental Impact Report

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno:

As a twenty-year resident of Nevada County, and a homeowner, I am writing to express my opposition to the approval of Rise Gold's permit to operate the Idaho-Maryland Mine.

Ind 547-1

Rise Gold has released its draft Environmental Impact Report and claims that it shows that its operations will have no or minimal environmental impacts on our community. It would have us believe that operating a major industrial operation next to businesses, a hospital, nursing homes, and residences will have no effect on our health or quality of life. Of course, such a claim is ridiculous.

Ind 547-2

It's important to remember that promises made in an EIR are just that—promises. Rise Gold is a penny stock with no experience in mining. The track record of their CEO, Ben Mossman, is horrific. The Canadian government had to shut down his operation in British Columbia in less than two years because of gross safety and environmental violations. Workers were left unpaid and cleanup costs well exceeded those needed to clean up their mess. There is no evidence that Mr. Mossman is capable of operating a mine in Grass Valley for as long as 80 years (or even much less) without creating the same environmental destruction that he did in Canada. But we do know that when he does, it will be up to us to clean up the mess and pay for it.

Ind 547-3

Specific to the accuracy of the EIR, the air monitoring data is questionable. The air monitoring data for ozone and small particulate matter is from monitoring equipment located about a mile northwest of the project site. Rise Gold did not conduct air monitoring at the project site, or in any other direction emissions from their operations will travel. Years ago, citizen ozone monitoring conducted at various locations around the Grass Valley/Nevada City area confirmed that ozone levels vary widely here due to our topography. So it's clear that Rise Gold's use of data from a single air quality monitor is insufficient to characterize at least the ozone in our area. For other air pollutants, the EIR references a monitoring station in Yuba City—31 miles away. Conflating air quality data from a city in the Central Valley with a topographically diverse town in the Sierra foothills does not present a true picture of our current air quality.

Ind 547-4

I strongly urge you to dig deep into Rise Gold's claims in the EIR and recommend to the supervisors that they turn down Rise Gold's application to operate the Idaho-Maryland mine.



↑  
Regards,  
*Mark Wilson*  
Mark Wilson  
11650 Forest View Drive  
Nevada City, CA 95959





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## **INDIVIDUAL LETTER 547: MARK WILSON**

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### **Response to Comment Ind 547-1**

The commenter notes that Rise Gold claims the DEIR shows the project's operations will have no or minimal impacts on the community. The commenter is directed to the actual DEIR and its findings, which reflect the County's review of the proposed project. As indicated in the DEIR, the proposed project would result in several adverse environmental impacts, some of which would remain significant and unavoidable, even after implementation of the mitigation measures identified in the DEIR. Because significant and unavoidable impacts have been identified in the DEIR, the County, should it decide to approve the proposed project, would be required to adopt a Statement of Overriding Considerations.

Pursuant to CEQA Guidelines Section 15093, CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." Such an outcome would necessitate a Statement of Overriding Considerations.

### **Response to Comment Ind 547-2**

Please see Response to Comment Ind 546-3.

### **Response to Comment Ind 547-3**

The commenter states that the DEIR utilized Yuba City as a location for air quality data, which the commenter states is not representative of Nevada County. As stated on page 4.3-10 of the DEIR, because the Grass Valley station only monitors ozone (O<sub>3</sub>) and PM<sub>2.5</sub>, additional measurements were taken from the Yuba City monitoring station (773 Almond Street, Yuba City, CA 95991), approximately 31 miles west of the project sites. The data collected at these stations are considered generally representative of the air quality experienced in the project vicinity. Further, this information is not used to model the project's emissions, and thus, has no bearing on the findings of the analysis.

### **Response to Comment Ind 547-4**

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 548**

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February 28, 2022

Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Ave, Suite 170  
Nevada City, CA 95959



Dear Matt Kelley,

This is a written comment regarding the DEIR on the proposed Idaho-Maryland Mine Project. I will focus my comments on **Chapter 4.13 WILDFIRE**.

I am a long-time resident of Nevada County with a professional background in women's health care and birth. In my young adult years I was a seasonal firefighter on both the Tahoe National Forest and the Stanislaus National Forest. I built a house and lived in the woods outside of Nevada City for 30 years. I have always been fire aware. In 2015, just two months after moving to Middletown, California, to be with my partner, we were burned out in the Valley Fire. In the years following we have seen even bigger and more devastating wildfires in California. We moved back to Nevada County after the fire and decided to live in town and our property happens to have a fire hydrant on corner which is abstractly comforting. It is an indescribable experience to lose everything one has ever had except one car and a suitcase. But we have our lives while others have been lost.

At present I am on a team working to organize our church members into what we call "Fire Clusters" to help one another in the event of a fire and an evacuation order is received. The input from ZoneHaven, the NC Fire Safe Council and the NC Office of Emergency Services have been supportive and informative. We utilized this action plan for the Bennett Fire, the River Fire and the Jones Fire in 2021.

Ind 548-1



I have studied Chapter 4.13, pages 1-28, and I am not reassured. I understand this DEIR was written by a reputable company with many qualified and skilled writers and there are still unanswered questions, unasked questions and, I believe, conclusions that are not supported by the information in this report. The deficiencies are listed below and "mitigations", which I believe are inadequate, and conclusions which I find to be unsupported, will be noted.

### Chapter 4.13 EXISTING ENVIRONMENTAL SETTING

Page 4.13.2

The fire protection agencies are described and it is not clear what the relevancy of who is the responsible service for structural fires when the concern of this chapter of the DEIR is wildfire. Yet the community has been informed that Rise Gold has promised Ophir Hill Fire Department a new fire truck and salaries for three additional fire fighters. I find this unethical when it is not known if this company will be allowed to even build this heavy industrial complex. In fact, both the Brunswick and Centennial sites are under the responsibility of the state CAL FIRE and designates both sites as Very High Fire Hazard Severity Zones (VHFHSZ). The map of Figure 4.13-1, shows the Brunswick site contiguous with the VHFHSZ of the entire region, and the Centennial site with approximately half its borders in the VHFHS Zone.

In the discussion of **Wildland Fire Hazards** the Topography and Vegetation and Prevailing Winds is described which states the closest slopes are 3-4 miles away. In fact, the gentle hills of Grass Valley begin to climb within a mile of the Brunswick site when heading up Greenhorn Road. While the fact that fire can move up a slope more readily is accurate, wildfires burn in the direction the wind blows and by currents produced by the fire itself. The mine sites are not immune to burning as the report suggests. The references to Deer Creek Canyon and Greenhorn Creek and Steep Hollow Creek are questionable, all which are miles away and have no bearing.

The "Large Fire History" states that "relatively few larger wildfires have occurred within the region over the past three years." This is FALSE. The

Ind 548-2

Ind 548-3





fires were not the mammoth conflagrations on the scale of the Caldor Fire or the Mendocino Complex or the Valley Fire but, as spelled out in the DEIR on pages 4.13-3 and 4.13-4, there were 16 wild fires that burned Nevada County since 2015 with three in the last two years. What is considered “relatively few”? The Bennett Fire came near to burning our town while the River Fire and the Jones Fire burned forest and homes. The local Grass Valley evacuation experience during the Bennett Fire was severely impacted by traffic congestion. A person I know who lives in a mobile home park in the Brunswick basin was unable to get out of because of traffic congestion. She was told she could try walking out by fire officials. This problem will be seriously compounded by the movement of mine trucks hauling waste rock through the basin.

The next discussion is under the title of **Fuel Treatment Efforts**. While fuel reduction is an important remedial step to reduce fire hazards, the relatively small amount that is described within the 1.5 mile radius will have little impact if there is a fire storm and spot fires preceding the front of a fire.

Ind 548-4

The map of Figure 4.13-2 shows a large section of western Nevada County and the areas of Fuel Treatment Projects. It is evident that there is only a very small percentage of land that has been treated or is planned to be treated anywhere near the project sites. The DEIR report then goes on to say where the fuel treatment projects are, which are in fact, miles away from the project sites. What is the relevance of these fuel treatment projects to the mine properties?

Ind 548-5

**Grass Valley Air Attack Base** (one of 13 in California) is noted along with **Wildfire Dispatch** that covers 12 operational areas. What is the relevancy?

Ind 548-6

Page 4.13-13 **Nevada County Emergency Operations Plan (EOP)** is noted. However, the second paragraph addresses a Mass Evacuation Annex (Annex B), yet to be approved by the Board of Supervisors. It described a plan for disasters that have been caused by and incidents *outside of Nevada County* and how to support a mass vehicular evacuation moving within or through Nevada County. Where in EOP is the evacuation of the mine employees or truck drivers addressed? According to Rise, there will be 200-300 hundred employees of which only the underground people will be doing shift work. How many workers and vehicles and trucks will be



evacuating along with residents at the time of a fire? This section needs critical review and reconsideration.

#### 4.13.4 IMPACTS AND MITIGATION MEASURES

This is the heart of this chapter of the DEIR which purports to discuss the impacts of reopening of the IMM related to Wildfire and the astonishing conclusion that states ALL IMPACTS ARE LESS THAN SIGNIFICANT. The reference to both the Standard of Significance and the Method of Analysis gives the impression the analysis will be impartial and non-biased. I find this to be far from accurate regarding the following matters:

The greatest concern regarding WILDFIRE is the impact of the trucking and traffic that this heavy industrial complex would add to the evacuation of the populace in the event of a fire in the region of the mine. This concern is included as one of the three impacts that are Significant after mitigations noted elsewhere in the DEIR.

Ind 548-7

How can the statements found on 4.13-1, page 4.15-15 that state 50-100 trucks per day, carrying 20 tons of rock per truck, that will be driving on Brunswick Road, which is classified as a "Minor Arterial" road and not be considered to have an impact on an evacuation order to that area? Plus "up to 18 additional truck trips could occur per day for various operations" for five years, 16 hours a day, seven days a week. This is 118 trips per day of trucks and does not include personnel in their own vehicles. As stated in this DEIR, this will constitute approximately 7.4 haul truck round trips per hour on Brunswick Road. This is an enormous amount of additional traffic coming into the basin and intersection of Brunswick Road and State Route 20/49 where, in an evacuation situation in the area of the mine will have people in their vehicles coming from all points east of Highway 20/49 if Hwy. 174 is closed. As I stated above, this area was a serious bottle neck with the Bennett Fire last year.

Ind 548-8

Most disturbing in the extensive discussion on evacuation in the case of Wildfire and an evacuation order in the vicinity of the mine is this: "...the incident command center would contact dispatch and direct them to contact the mine and REQUEST the mine operator to shut down the mine and cease all truck hauling operations". REQUEST? What sort of authority and





enforcement is in the word REQUEST? Evacuations for the public are ORDERS and are enforceable. Why would we think that this giant industrial complex, whose purpose is mining 24 hours a day and making as much money as possible, will shut down if it were "requested" to shut down and not ordered to do so? An evacuation order doesn't "request" that people leave their properties but orders them to do so. They are not allowed back in until the order is lifted. What if the mine operators were to say "No, we will not shut down our mine"? Many large companies are known to pay fines for infractions of laws as part of the cost of doing business... at what cost to our community?

Ind 548-9

I cannot believe that this item is being considered to "have a less than significant impact related to substantially impairing an adopted emergency response plan or emergency evacuation plan" and no mitigation is required as stated on page 4.13-17. This must be reconsidered as it is also a complete contradiction to the "Significant and unavoidable" impact this project will have on Transportation in spite of mitigations on the Brunswick and SR20/49 intersection. This section needs careful review and reconsideration.

Ind 548-10

**Chapter 4.13-2** further discusses the matter of topography and wildfire risk. The second paragraph spells out that there are four acres and seven acres that have steep slopes of 30% or greater between the two sites, yet also states these steep slopes will not have an impact on fire behavior. This is totally contradictory from the discussion of fire behavior on slopes and prevailing winds which "could burn through the Sites" of both Brunswick and Centennial sites. This matter needs careful review and reconsideration.

The report goes on to say that on the Brunswick site, 18.5 acres of the 58 acres of forest will be cut down. On the Centennial site, 6.5 acres of the 10 acres of forest will be cut down. This is called "vegetation reduction" which sounds like a clear-cut. Has the environmental impact of a 25-acre clear cut been considered?

The report goes on to reiterated the fuel treatment projects far and wide in western Nevada County, which I have already commented on as to the



	<p>irrelevancy of these distant projects (some of which have been seeking funding for years).</p>
<b>Ind 548-11</b>	<p>Why is there an inclusion in the description, in this section of the DEIR, to install a potable water line for residents along East Bennett Road as an example of roadside fuel reduction? There is already a Right of Way on the road to install such a pipeline so what fuel reduction will be done in digging up the road? This potable water line has been proposed to be installed by N.I.D. and paid for by Rise Gold as the wells along this road are anticipated to be negatively impacted.. At the same time Rise Gold has said repeatedly that the wells in the area will not be impacted. If this is true, why is a water line needed? Why is putting a water line in being used as an example of “fuel reduction” to reduce wildfire hazard? This section needs careful review and reconsideration.</p>
<b>Ind 548-12</b>	<p>Rise Gold’s Fire Protection Plan for the proposed project has both 30-foot and 100-foot defensible space zones. This seems to be adequately described and no dead trees, leaves or firewood piles will be allowed. Tiny plots of landscape greenery are shown in Figure 4.13-3 to beautify the industrial complex. Is this part of their Aesthetics mitigation? Most of Zone 2 will be asphalt so there will be no combustible materials. The building materials will be compliant with ignition-resistant materials. It seems that should a wildfire approach, the project property and buildings will be safe, unless the explosives that are being trucked in during a wildfire explode or the diesel tanks ignite.</p> <p>Why does the DEIR include a “fire flow system” as support of this project having “less than significant” impacts? Then go on to state, page 4.13-20 paragraph 3, that it is not known if the old fire flow infrastructure used by the lumber mill, even meets CFC requirements? Please review this for validity.</p>
<b>Ind 548-13</b>	<p>Has a “comprehensive vegetation management plan required by the County Fire Marshall’s Office been provided? If so, how will the plan be adhered to “in perpetuity” if the company goes bankrupt (which this company did on its last project in British Columbia)? If not, how can it be included in this DEIR and give support to the DEIR conclusion that this</p>



project's impacts will be mitigated to "less than significant" regarding Wildfire impacts?

Ind 548-14

Another questionable assertion by the DEIR is that the CAL FIRE station on Ridge Road could reach a theoretical fire at the mine within the 5-minute response time goal. The DEIR acknowledges the response time is "depending on local traffic conditions". Once again, the unmitigable and significant impact of traffic at Brunswick Road and SR 20/49 comes into focus.

Ind 548-15

I am alarmed by the second paragraph on page 4/13-21 that states the transportation, storage and use of explosives will comply with Federal and State laws and states "given that storage and use of explosives would only occur underground at the Brunswick Industrial Site, an unexpected explosive event would not be likely to exacerbate above-ground wildfire risks". Does this address the matter of trucks carrying the explosives to the mine through our town or the time of transferring these explosive materials to be stored underground? What ensures these trucks will not be involved in a vehicle accident during transit between where the explosives are purchased and to the mine? The risk will be increased during the high tension of a mass vehicular evacuation. Please review the following link: <https://www.nytimes.com/2022/01/20/world/africa/ghana-explosion-mining-truck.html>

Ind 548-16

If I am reading the long third paragraph on page 4.13-21 correctly, we can be assured that the dewatering of the mine is at deeper levels than where the roots of the trees and plants are. This makes sense. Then details describe the depth of groundwater varies considerably depending on the topography and that there is seasonal fluctuation. This too makes sense. What is not at all clear is the assertion that the water discharged into South Fork Wolf Creek from the mine, which we have been told by Rise Gold to be over 3.6 million gallons a day for the initial six months followed by 1.2 million gallons a day for 80 years, would "prevent the lowering of the groundwater levels along the reach of that creek whereas only a small fraction of the groundwater that was removed from the subsurface would come from that area". What is this saying? Is it saying groundwater is being removed? The mine claims the dewatering will have no effect on groundwater yet this report says "only a fraction... that was removed".





What is accurate? The report then makes a vague reference to NID's releases into Wolf Creek during the dry season. What does this have to do with the impact of dewatering of the mine and wildfire hazards? The statements add to the questionable quality of this DEIR and needs careful review.

**Reclamation**, page 4.13-21

Reclamation certainly is an important consideration to this mine closing before 80 years. There is notation of removal of "The tallest structures on-site" along with the covered conveyor system and the above ground 20,000-gallon diesel fuel tanks...". Why is this number not consistent with what is stated to be two 12,000 tanks on the Brunswick site and 1,200 gallon tank on the Centennial site? Who will pay for this part of the reclamation if Rise Gold goes into bankruptcy? Who will pay for the reclamation of the damage to the ground water and the ecosystems of the North Fork Wolf Creek? Who will pay for the loss of property value if the private property owners wells are dry or contaminated? The people will pay. The people of Nevada County and state of California and the people of the United States is who will pay. Bankruptcy was claimed by Rise Gold on their last project and the posted bond for clean-up is a small fraction of what is needed. The Canadian courts are still battling for financial accountability of Rise Gold.

Ind 548-17

The **Conclusion** of this section of the DEIR states the proposed project could have a significant impact related to exacerbation of wildfire risks without a vegetation management plan. A vegetation management plan would theoretically reduce the Wildfire risks. Still there is NO mention of the need to evacuate in the case of a wildfire. This is after detailed description of the 118 round trips of truck which the "Conclusion" ignores completely.

Ind 548-18

Next in the report comes the **Mitigation Measures** starting on page 4.13-22, where every impact noted in this chapter is mitigated to a "*less-than-significant level*". The report contends that a vegetation management plan and the creation of defensible space, wildfire danger becomes insignificant.

Ind 548-19



- Ind 548-20
- Is this to suggest that wildfire danger becomes insignificant to property owners if they create defensible space around their homes? While this may help save their home it does not make the risk "insignificant". Homeowner's insurance has sky rocketed because of fire danger in our state and elsewhere, yet this report says wildfire danger is insignificant for the mine property simply with a vegetation management plan. Our home had well maintained defensible space and it burned to the ground in the Valley Fire.
- On page 4.13-24 we are asked to have confidence that PG&E will eliminate the fire danger from the power poles and lines that will service the mine complex. Recent history tells us that regardless of what PCR 4292 and PCR 4293 says about firebreaks and tree/branch removal, fires do still start from trees and branches falling on PG&E power lines. I am not reassured and I ask that this be carefully reviewed and reconsidered.
- Ind 548-21
- The presence of two 12,000-gallon tanks of diesel fuel, for a total of 24,000 gallons of fuel, will be transported and stored in tanks on site. The report suggests that with the use of Chapter 23 of the CFC and Fire Marshall's inspections, there will be NO potential for fire danger and environmental catastrophe. However, human errors happen. Another tank, containing 1,200 gallon of diesel fuel will be located on the Centennial Site which is surrounded by our town.
- Ind 548-22
- The item 4.13-4 yet again suggests there will be "less-than-significant" impacts of post-event hazards such as flooding or landslides following the "less-than-significant" impact of a wildfire involving this project. I appreciate the discussion of the post-fire debris-flow hazard assessment of the 2017 McCourtney Fire in our community. However, as noted in this DEIR, the difference is the presence of mine tailings and the presence of North Fork Wolf Creek. Mine tailings will not allow rains to soak into the ground and the creek will be impacted by runoff. In light of the differences, how does the McCourtney Fire assessment apply to this project? Have the homes that are located along Wolf Creek, which are already prone to flooding, been considered? We have all seen those modest homes being flooded in times of high water and how will the addition of 1.2-3.6 million gallons a day





do to the flooding when the creek rises with natural heavy rain runoff?  
Again, this is a matter that needs further review and analysis.

**Cumulative Impacts and Mitigation Measures 4.13-5**

The final page of this chapter is the ultimate statement that with the mitigations proposed by the mine owners, there will be **no significant cumulative impact** related to the exacerbation of wildfire risk. How can this be? My focused analysis of this chapter of the DEIR, along with common sense tells me otherwise. Wildfire is ALWAYS a risk to our rural county. The combination of a heavy industrial complex in a VHFHSZ, the added heavy trucking traffic on our roads, the transportation of explosives and fuel on our roads and through our communities, the storage of explosives and fuel on the site, the history of PG&E caused fires, the questionable reputation of Rise Gold, the potential of human errors and accidents, does little to reassure me that this project will not have a negative impact on life in our community in spite of the findings of this report.

I respectfully ask that all my concerns and comments be reviewed and considered by the Planning Department of Nevada County, before a recommendation is made to the Board of Supervisors.

Respectfully submitted,

*Martha Turner.*

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Ind 548-23



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## **INDIVIDUAL LETTER 548: MARTHA TURNER**

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### **Response to Comment Ind 548-1**

This is an introductory comment. Responses to specific comments are provided below.

### **Response to Comment Ind 548-2**

As discussed on page 4.13-7 of the DEIR, CAL FIRE has primary responsibility for wildfire suppression on lands within SRAs, wherein the Centennial and Brunswick Industrial Sites are located. The CAL FIRE Nevada-Yuba-Placer Unit serves the project area. Notwithstanding, depending upon the incident, other fire agencies may provide response during a wildfire incident through mutual and/or automatic aid agreements. These agencies are discussed in Chapter 4.11, Public Services and Utilities, of the DEIR.

As stated in page 4.13-17 of the DEIR, with regard to the wildfire analysis, significant slopes are those in steep-walled canyons or mountainous valleys. The DEIR does not suggest the project sites are immune to wildfire and states on page 4.14-17 that that a fire burning in the forested terrain southwest of the Centennial and Brunswick Industrial Sites could burn through the Sites due to prevailing southwesterly winds. As stated on page 4.13-18 of the DEIR, CEQA Guidelines Appendix G indicates that additional factors must be considered to determine the potential for a project to exacerbate wildfire risk. Among these other factors is the extent and nature of on-site vegetation.

### **Response to Comment Ind 548-3**

As stated on page 4.13-3, the definition of “larger wildfires” occurring within the region is according to CAL FIRE. The project truck traffic would not substantially interfere with an evacuation plan. Please see Master Response 5 - Evacuation Zones.

### **Response to Comment Ind 548-4**

The purpose of Section 4.13.2 of the DEIR is to describe the existing wildfire setting in the project region as stated on page 4.13-1 of the DEIR.

### **Response to Comment Ind 548-5**

The purpose of Section 4.13.2 of the DEIR is to describe the existing wildfire setting in the project region as stated on page 4.13-1 of the DEIR.

### **Response to Comment Ind 548-6**

The Nevada County Emergency Operations Plan does not address any specific projects. As stated on page 4.13-13 of the DEIR, the Nevada County Emergency Operation Plan (EOP) delineates responsibilities of first responders (fire and law) and other response support organizations, e.g., Department of Public Works, Environmental Health, etc. for natural disasters and manmade emergency incidents in Nevada County. The EOP is intended to mitigate future disasters and emergency incidents. Project traffic would not substantially interfere with an evacuation plan. Please see Master Response 5 - Evacuation Zones.

### **Response to Comment Ind 548-7**

Please see Master Response 5 - Evacuation Zones.

### **Response to Comment Ind 548-8**

Please see Master Response 5 - Evacuation Zones.



### **Response to Comment Ind 548-9**

Please see Master Response 5 - Evacuation Zones. For clarification purposes, as demonstrated in Chapter 4.12 of the DEIR, the project would not have any significant and unavoidable impacts to intersections near the SR20/49 intersection.

### **Response to Comment Ind 548-10**

The DEIR does not state that the on-site slopes over 30% will not have an impact on fire behavior, but rather the amount of 30% slopes is not a substantial factor in influencing on-site fire behavior, as would be the case for the more fire risk topographical areas in the region, such as Deer Creek canyon and Greenhorn Creek canyon. Whereas the project site has some limited steep slopes, these other areas in the region are marked by *both* topographic characteristics (i.e., steep slopes) and topographic features contributing to fire risk (e.g., canyons, ridges, chutes and saddles).<sup>1</sup> The impact to vegetation communities, including those mentioned by the commenter (e.g., on-site tree removal), is analyzed in Chapter 4.4 of the DEIR.

### **Response to Comment Ind 548-11**

The project does not propose to conduct fuel treatment along E. Bennett Road. As stated on page 4.13-5 of the DEIR, with respect to planned but not yet funded fuel treatment projects in the immediate vicinity (i.e., grant application submitted but award not yet confirmed), the primary project is roadside vegetation management (to create defensible space) along East Bennett Road, where the potable water pipeline would be installed, as well as the portion of Brunswick Road along the frontage of the Brunswick Industrial Site. Similar roadside vegetation management is also proposed along Greenhorn Road, east of the Brunswick Industrial Site.

As stated on page 4.8-66 of the DEIR, the proposed mining operations could result in adverse effects to seven domestic water supply wells in the East Bennett area during the life of the mining operation. After reclamation, when the mine is allowed to flood, groundwater levels in the wells would recover to their approximate pre-project levels. As discussed in the Project Description chapter, pursuant to Nevada County General Plan Policy 17.12, the project would address this by installing a potable water supply line in East Bennett Road and providing individual well owners with a connection to the potable water line. While only seven wells are projected to be adversely affected, the applicant has prepared a Well Mitigation Plan (February 2, 2021) that would connect up to 30 properties in the East Bennett area to the NID potable water system.

### **Response to Comment Ind 548-12**

The landscaping shown in Figure 4.13-3 is part of the planned landscaping as further described in Chapter 4.1 of the DEIR. The fire flow system is not constructed yet. As stated on page 4.13-20, two existing fire service lines extend into the Brunswick site. The installation of the fire flow system for the project would be required to meet California Fire Code (CFC) requirements.

### **Response to Comment Ind 548-13**

A Vegetation Management Plan is not required to be submitted until improvement plans, such as grading or building permit applications are submitted. Mitigation Measure 4.13-2 requires that in conjunction with submittal of Improvement Plans, the applicant shall submit a comprehensive Vegetation Management Plan, inclusive of the Centennial and Brunswick Industrial Sites, for the review and approval by the County Fire Marshall's Office. The mitigation measure is legally adequate pursuant to CEQA in that it has sufficient performance standards to ensure that the

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<sup>1</sup> E.g., see <https://www.nwcg.gov/sites/default/files/training/docs/s-190-ig04.pdf>.



future management plan will reduce the potential wildfire impact to a less-than-significant level. As stated in CEQA Guidelines, Section 15126.4(a)(1)(B):

The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure.

The applicant shall implement all provisions of the Vegetation Management Plan during the project's construction, operations, and reclamation activities.

Please also see Master Response 3 - Operator Responsibility.

#### **Response to Comment Ind 548-14**

The commenter appears to question information obtained from the County's personal communication with local fire agencies. As stated in the DEIR, depending on local traffic conditions, a wildland engine from Station 20 could potentially reach the Centennial and/or Brunswick sites within 5 minutes. This would assume the most direct route using Old Tunnel Road to Brunswick Road. The project does not have a significant and unavoidable traffic impact to any roadways or intersections on Brunswick Road and Highway 20/49. Please see Chapter 4.12 of the DEIR and Master Response 5 - Evacuation Zones.

#### **Response to Comment Ind 548-15**

The transportation of explosives in the United States has an excellent safety record. A review of DOT incident reports for highway transportation of class 1.1B, 1.4B, 1.1D, and 1.5D materials shows 149 incidents over the past 30 years in the United States. The majority of these incidents were vehicle accidents resulting in no release or spillages. No fatalities were reported in any incidents and only 1 incident resulted in injuries. Please also see Master Response 10 - Explosives, Reagents, and Brunswick Fill, and Master Response 5 - Evacuation Zones.

#### **Response to Comment Ind 548-16**

Please see Master Response 33 - Groundwater Dependent Vegetation.

#### **Response to Comment Ind 548-17**

No reference to 20,000-gallon tanks is made on page 4.13-32 of the DEIR. As stated on page 2-3 of the DEIR, a Reclamation Plan and Financial Assurance Cost Estimate (FACE) will be required for the project. As stated on page 4.6-24 of the DEIR, to ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan. The Reclamation Plan is provided in Appendix C of the DEIR.

The mine water discharge would have a less than significant impact after mitigation on the ecosystem of South Fork Wolf Creek. Please see Chapters 4.4 and 4.8 of the DEIR, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 - Flows in South Fork Wolf Creek.



The project would have a less than significant impact after mitigation to domestic water wells. Please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

With regard to property values, please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Please also see Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 548-18**

Please see Master Response 5 - Evacuation Zones.

### **Response to Comment Ind 548-19**

As stated on page 4.13-2, the Centennial and Brunswick Industrial Sites have limited steeply-sloping topography that is known to exacerbate wildfire risk and spread. Prevailing wind conditions within the surrounding area are from the North-East and South-West directions, both of which have forest lands. The incorporation of defensible space around proposed structures at the Brunswick Industrial Site, as well as designing buildings in conformance with Chapter 7A of the CBC, would help to slow the spread of wildfire moving through the area. In addition, proposed improvements at both Sites would reduce the vegetation fuel load in the area. Nevertheless, vegetation would remain on both Sites and would need to be managed on an ongoing basis. In addition, use of hydrocarbon-powered heavy-equipment on-site could exacerbate wildfire risk. Without implementation of a vegetation management plan, the proposed project could have a significant impact related to exacerbating wildfire risks, and thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Mitigation Measure 4.13-2 of the DEIR mitigates this risk.

### **Response to Comment Ind 548-20**

The commenter asserts that the project could result in wildfire impacts due to branches falling on PG&E infrastructure and PG&E's failure to follow legal requirements for firebreaks and tree/branch removal. PG&E infrastructure exists throughout the County regardless of the project. Nonetheless, wildfire risk due to the placement of limited power conveyance lines on the project sites and PG&E's failure to follow legal requirements for firebreaks and tree/branch removal is speculative. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

### **Response to Comment Ind 548-21**

Page 3.13-24 of the DEIR states the project would install two, 12,000-gallon above-ground diesel fuel storage tanks on the Brunswick Industrial Site. The tanks would be located in the industrial building complex area, away from existing and proposed vegetation. Diesel fuel is considered a Class II liquid, and as such, the tanks would be regulated in accordance with Chapter 23 of the CFC. Chapter 23 of the CFC includes robust design requirements for above-ground fuel storage tanks to minimize fire hazard to the maximum extent feasible, including but not limited to requirements for overfill protection, spill containment, and dispenser emergency shutoff valve. Compliance with CFC requirements, as determined by the Fire Marshall's Office, at time of improvement plan review, would reduce fire hazards related to on-site fuel storage tanks. The proposed 1,200-gallon temporary diesel fuel tank at the Centennial Industrial Site would also





comply with CFC standards related to siting and maintenance of clearance space (i.e., removal of grass and weeds).

**Response to Comment Ind 548-22**

As stated on page 4.13-26 of the DEIR, although runoff from both Sites flows into creeks, the project includes drainage facilities to capture runoff prior to entering the creeks. Should a fire occur on one or both of the project sites, the proposed drainage facilities would capture and slow post-fire runoff, thus minimizing flooding potential downstream. As stated on page 4.8-70 of the DEIR, the proposed detention basins would hold back the peak flows and release the water at a lower rate and at a later time than currently occurs from those site areas. As a result, the project would reduce peak storm flows in both Wolf Creek and South Fork Wolf Creek.

**Response to Comment Ind 548-23**

This comment is a summary of the commenter's previous statements. Responses to specific comments are provided above in Responses to Comments Ind 548-1 through Ind 548-22.



Individual Letter 549

1/31

Spoken Comment for Planning Commission Special Meeting March 24, 2022

Ind 549-1

My name is Martha Turner and I live at 10860 Dolores Drive, Grass Valley, Supervisor District 3. I am a retired Nurse Practitioner and Nurse Midwife, I am not, as Don Rogers referred to, a "busybody", and have mostly lived in Nevada County since 1960. I was a Forest Service firefighter as a young adult and in 2015 we lost our home to a WILDFIRE, which makes this subject near to my heart.

My DEIR comment today is on Chapter 4.13 titled WILDFIRE and request that the following matters be further reviewed by the Planning Commissioners before a recommendation is made to the Board of Supervisors. I was NOT reassured by what I learned.

Ind 549-2

- The report suggests the mine site will be immune to the danger of a wildfire. Yet, there is forest on both sites.
- The report minimizes the risk of fire in our region. In fact, there have been 16 wild fires that burned in Nevada County since 2015.

Ind 549-3

- The report does NOT adequately address how the mass evacuation of residents, along with an additional 312 mine employees, will be handled.

Ind 549-4

- Quite disturbing is the statement, that in the event of a wildfire, fire officials would "REQUEST" the mine to shut down. What sort of authority and enforcement is in the word REQUEST?

Ind 549-5

- While truck traffic is recognized elsewhere in the DEIR as "Significant", this part of the DEIR states the impact of truck traffic is "Less than Significant" in the event of a wildfire. This makes no sense.

Ind 549-6

- There is no discussion in relation to WILDFIRE about the trucks carrying explosives through town or the transferring of these explosive materials before they are stored underground.

Ind 549-7

- The report contends that with a "vegetation management plan" wildfire danger becomes "Insignificant". Our home had a well-maintained defensible space and still burned to the ground.



pg. 2

Ind 549-8

- The report states that the presence 24,000-gallons of diesel fuel on site will have NO potential for fire danger and environmental catastrophe. NO POTENTIAL?

Ind 549-9

- It is also stated there will be a "less-than-significant" risk of flooding, even though it acknowledges mine tailings DO increase water runoff. What happens to the homes located on Mill Street along Wolf Creek? We have all seen those back yards being flooded when the creek rises. There is no consideration of the impact of an additional 1.2-3.6 million gallons of water a day going into the creek and added to heavy rain fall.

Ind 549-10

The final page of this chapter is the statement that this mine will cause **no significant cumulative impact** related to wildfire risk. My focused analysis of this chapter, along with common sense, tells me otherwise.

Thank you very much for hearing my comment.

Martha Turner



10860 Dolores Drive

Grass Valley, CA 95945

530.632.3187

turnermartha19@gmail.com



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## **INDIVIDUAL LETTER 549: MARTHA TURNER**

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### **Response to Comment Ind 549-1**

The comment expresses a general opinion that the discussions and analyses in Chapter 4.13, Wildlife, of the DEIR are inadequate, but does not provide specific examples that would allow for a detailed response. Such examples are provided in subsequent comments.

### **Response to Comment Ind 549-2**

The DEIR does not state the project is immune to wildfire danger. Chapter 4.13 of the DEIR assesses the project's impacts related to Wildfire. Page 4.13-22 of the DEIR states, the Centennial and Brunswick Industrial Sites have limited steeply-sloping topography that is known to exacerbate wildfire risk and spread. Prevailing wind conditions within the surrounding area are from the North-East and South-West directions, both of which have forest lands. The incorporation of defensible space around proposed structures at the Brunswick Industrial Site, as well as designing buildings in conformance with Chapter 7A of the CBC, would help to slow the spread of wildfire moving through the area. In addition, proposed improvements at both Sites would reduce the vegetation fuel load in the area. Nevertheless, vegetation would remain on both Sites and would need to be managed on an ongoing basis. In addition, use of hydrocarbon-powered heavy-equipment on-site could exacerbate wildfire risk. Without implementation of a vegetation management plan (VMP), the proposed project could have a significant impact related to exacerbating wildfire risks, and thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Mitigation Measure 4.13-2 requires implementation of a VMP on an ongoing basis.

Please see Response to Comment Ind 548-3.

### **Response to Comment Ind 549-3**

Please see Responses to Comments Ind 548-6 and 548-7.

### **Response to Comment Ind 549-4**

Please see Response to Comment Ind 548-8.

### **Response to Comment Ind 549-5**

Please see Responses to Comments Ind 548-6 and 548-7.

### **Response to Comment Ind 549-6**

Please see Response to Comment Ind 548-15.

### **Response to Comment Ind 549-7**

Please see Response to Comment Ind 548-19.

### **Response to Comment Ind 549-8**

Please see Response to Comment Ind 548-21.

### **Response to Comment Ind 549-9**

Please see Response to Comment Ind 548-22.



**Response to Comment Ind 549-10**

Please see Response to Comment Ind 548-23.





**Individual Letter 550**

Dist 1

RECEIVED

MAR 03 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Nevada County Board of Supervisors  
950 Maidu Ave. Suite 200  
Nevada City, CA. 95959

Dear Supervisors,

**Ind 550-1**

I live on Greenhorn Road, close to the site of the proposed reopening of the Idaho-Maryland mine. I've been following closely what opening this mine is likely to do to our community. I've read the summary DEIR and followed the letters and commentary written by many informed residents. My concerns have NOT been mitigated.

**Ind 550-2**

First of all, switching 31 residents from wells to NID is a laughable solution to the risks of the mine using millions and millions of gallons of water. This water is a public resource, not for the use of one company - a foreign company - to make a profit. We are currently in the worst drought in 1200 years and absolutely no one is suggesting that this will end soon. Given climate change it is more likely to worsen over time. Giving this resource away prioritizes a foreign company's profit over the well being of local residents.

**Ind 550-3**

I have many, many more concerns. Air and water pollution, noise, traffic, a degradation of local aesthetics. I found the mitigation proposals in the DEIR to be weak and unconvincing. But even more concerning is the past record of Rise Gold. They violated multiple environmental and safety standards in their last project, claimed bankruptcy and walked away leaving polluted waters and

**Ind 550-4**

hundreds of thousands of dollars in costs to the community. Rise Gold has shown us who they are. Shame on us if we ignore that.

**Ind 550-5**

Yes, we need jobs in Nevada County. Filling in gaps in broadband, expanding infrastructure in our current industrial areas are potential starts. Let's look to a sustainable future, not our polluting mining past.

Thank you,  
Marv Hoffman



## **INDIVIDUAL LETTER 550: MARV HOFFMAN**

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### **Response to Comment Ind 550-1**

The commenter expresses general project-related concerns. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 550-2**

Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 550-3**

Please see the discussions and analyses in Chapter 4.1, Aesthetics, of the DEIR.

In addition, the commenter expresses a general opinion that the mitigation measures set forth in the DEIR are “weak and unconvincing,” but does not provide specific examples that would allow for a detailed response. Please see Master Response 1.

### **Response to Comment Ind 550-4**

Please see Master Response 3 – Operator Responsibility.

### **Response to Comment Ind 550-5**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 551**

Matt Kelley  
Nevada County Planning Commission  
950 Maidu Ave. St. 170  
Nevada City, Ca. 95959



Dear Mr. Kelley,

**Ind 551-1**

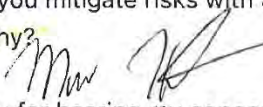
I have read the summary of the DEIR for the proposed opening of the Idaho-Maryland mine. I have also been paying close attention to the opinions of many qualified and informed members of our community. It is obvious that there would be many serious impacts if the mine were to reopen.

**Ind 551-2**

I'm very concerned about aesthetics, noise, traffic and potential pollution of our air and water. But my primary concern is the amount of water that the mine will use. We are currently in the worst drought of 1200 years. No one seems to think that this drought will be over soon, or if climate change will worsen the drought and make it permanent. Allocating massive amounts of water to a foreign company so that they can make a profit is likely to be at the cost of local residents. I live on Greenhorn Road and fear for my well. Transferring 31 homeowners from wells to NID will not solve this problem. These risks are real and cannot be mitigated.

**Ind 551-3**

Though water is my primary concern I am also worried that the proposals for other mitigations are weak and that enforcement is vague. We are dealing with a company that went bankrupt on it's previous project and left the community with the costs. They were charged with many violations of environmental and safety standards. Why would we believe that this project will be any different? How can you mitigate risks with a company whose own track record shows that they are not trustworthy?

  
Thank you for hearing my concerns.  
Marv Hoffman



## **INDIVIDUAL LETTER 551: MARV HOFFMAN**

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### **Response to Comment Ind 551-1**

The comment does not address the adequacy of the DEIR, but expresses general concerns related to the project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 551-2**

The commenter expresses general concerns regarding aesthetics, noise, traffic, air and water pollution, and groundwater impacts. These topics are addressed in detail throughout the DEIR - please see Master Responses 1. Regarding well impact and climate change concerns, please see Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 551-3**

The comment expresses a general opinion that the mitigation measures set forth in the DEIR are “weak and that enforcement is vague,” but does not provide specific examples that would allow for a detailed response.

Please also see Master Response 3 – Operator Responsibility. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 552**

Matt Kelley  
Nevada County Planning Commission  
950 Maidu Ave. St. 170  
Nevada City, Ca. 95959



Dear Mr. Kelley,

**Ind 552-1**

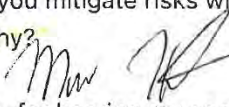
I have read the summary of the DEIR for the proposed opening of the Idaho-Maryland mine. I have also been paying close attention to the opinions of many qualified and informed members of our community. It is obvious that there would be many serious impacts if the mine were to reopen.

**Ind 552-2**

I'm very concerned about aesthetics, noise, traffic and potential pollution of our air and water. But my primary concern is the amount of water that the mine will use. We are currently in the worst drought of 1200 years. No one seems to think that this drought will be over soon, or if climate change will worsen the drought and make it permanent. Allocating massive amounts of water to a foreign company so that they can make a profit is likely to be at the cost of local residents. I live on Greenhorn Road and fear for my well. Transferring 31 homeowners from wells to NID will not solve this problem. These risks are real and cannot be mitigated.

**Ind 552-3**

Though water is my primary concern I am also worried that the proposals for other mitigations are weak and that enforcement is vague. We are dealing with a company that went bankrupt on it's previous project and left the community with the costs. They were charged with many violations of environmental and safety standards. Why would we believe that this project will be any different? How can you mitigate risks with a company whose own track record shows that they are not trustworthy?

  
Thank you for hearing my concerns.  
Marv Hoffman





## **INDIVIDUAL LETTER 552: MARV HOFFMAN**

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### **Response to Comment Ind 552-1**

Please see Response to Comment Ind 551-1.

### **Response to Comment Ind 552-2**

Please see Response to Comment Ind 551-2.

### **Response to Comment Ind 552-3**

Please see Response to Comment Ind 551-3.



**Individual Letter 553**

**From:** Mary Anderson <andersonmaryf@hotmail.com>  
**Sent:** Monday, April 4, 2022 4:08 PM  
**To:** Idaho MMEIR  
**Subject:** Rise Gold Proposal

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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Matt Kelley  
Planning Commission  
Nevada County

Mr. Kelley,

I live off of Beaver Drive and share a property line with the Brunswick mine site. I have lived here for thirty years and this is the third time we have been faced with the possibility of reopening the mine. I am completely opposed to this proposal and feel that any benefit to the community is far outweighed by the risks involved. I believe the DEIR mitigation measures to be inadequate in addressing my concerns—mainly water, air and noise pollution, and truck traffic.

**Ind 553-1**

1) The hydrology report does not address the possibility of water loss to private wells in the area other than the thirty wells on East Bennett. Ten plus years ago when Emgold was applying to reopen the mine, I believe our wells were designated as being at risk. Why are they no longer at risk? Also, there is no assurance that we would be supplied water by NID in the event that this happens—no bond in place to cover the cost and no guarantee that NID would even have enough water supply to provide for us. When we are in a wildfire area and a period of significant drought, does it really make sense to pump millions of gallons from the mine, allowing more water to flow into it, thus reducing the amount of groundwater available to all of us? I think not.

**Ind 553-2**

2) I believe air pollution is a significant risk to the health of our community that cannot be adequately mitigated. What is less than significant to one person can be quite significant to another. Contaminants from asbestos, silica, and diesel emissions produced by mining activity can become airborne and as such would likely contribute to serious illness like lung cancer, asthma, and other acute or long term disease. The air quality in Nevada County already receives a poor rating. Does it really make sense to make that rating even worse? I think not.

**Ind 553-3**

3) Noise from blasting, rock grinding and dumping into steel truck beds to be hauled away, even the constant back-up beeping from the trucks—all to be occurring 24/7—will not likely be mitigated to a less than significant level. And again, less than significant differs from one person to another. What is “less than significant” anyway? It is definitely not “insignificant”.

**Ind 553-4**

4) As far as traffic, it's not just about the number of trucks on the road at any given time. It includes traffic congestion at the Loma Rica/Brunswick signal at peak times with workers entering and exiting the Loma Rica Business Park area—with trucks traveling at slower speeds on the uphill grade in that area. It includes wear and tear on the roads, diesel



Ind 553-5

truck exhaust fumes, and noise from those trucks all 16 hours/day (6 a.m. to 10 p.m.) 7 days per week! I don't think all this can be adequately mitigated.

As I stated earlier, these are just some of the concerns I have about moving forward with this project. Others have addressed significant and valid concerns regarding environmental issues, aesthetics, electrical energy consumption, greenhouse gas emissions, and monitoring and enforcement of regulations. I urge you to give serious consideration to all of these concerns when weighing your decision. We are a vibrant community, we love this area, and we are deserving of that consideration.

Sincerely,  
Mary Anderson

Sent from my iPad



## **INDIVIDUAL LETTER 553: MARY ANDERSON**

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### **Response to Comment Ind 553-1**

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The commenter also states that the DEIR does not discuss the potential impact to groundwater wells outside of the East Bennet Road private wells.

The DEIR and previous hydrogeologic assessments consider the groundwater wells in the Beaver Drive area to "low risk." The commenter is referred to Master Response 13 - Historic Hydrogeologic Assessments. The DEIR's current assessment and analysis of domestic water wells for the Beaver Drive area is provided in Chapter 4.8 and Appendix K.2 (Groundwater Hydrology and Water Quality Analysis.) As shown in Table 4.2 of Appendix K.2, project drawdowns in the Beaver Drive area are projected to be minimal, ranging up to 3 feet or 4.3% of the well water column. Groundwater monitoring and well mitigation, if necessary, is required for the project. (see DEIR, Appendix K.8, Idaho-Maryland Mine Groundwater Monitoring Plan.) Groundwater monitoring is designed to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

The DEIR discusses the dewatering effect on soil moisture and vegetation as it pertains to wildfire risk on page 4.13-21. The DEIR states that groundwater typically exists below the rooted vegetation and tap roots for trees and thus would not impact vegetation and increase fire risk. (DEIR, p. 4.13-21.) The commenter is also referred to Master Response 33 – Groundwater Dependent Vegetation and Master Response 16 - Drought and Climate Change.

### **Response to Comment Ind 553-2**

The commenter is concerned with impacts to air quality and states that what is "less to significant" can vary throughout the population but does not identify why the DEIR is inadequate. The DEIR's Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) examines air pollution including asbestos, silica, and diesel emissions. The commenter is referred to Master Response 18 - Air Quality Thresholds.

### **Response to Comment Ind 553-3**

The commenter states that noise from blasting, grinding (mineral processing), and noise from loading trucks is not likely mitigable to a less than significant impact but does not state by the DEIR is inadequate. In assessing the impacts from blasting, the DEIR utilizes data from a long-term blasting noise level survey from the Sutter Gold Mine in Amador County, CA from 2013. (DEIR, p. 4.10-44.) Based on that data, the DEIR concludes that any blasting-related noises would fall below the applicable daytime, evening, and nighttime criteria. (DEIR, p. 4.10-44–45.) The DEIR states that the noise impacts associated with mineral processing would be less than significant. (see DEIR, p. 4.10-37–38; Table 410-17.) The DEIR states that the dumping of rock or sand tailings into truck beds would take place in three locations. Barren rock is loaded into trucks inside a building at the Brunswick shaft by a conveyor (DEIR, Appendix L, p. 35.) and sand tailings are loaded into trucks inside the process building (DEIR, Appendix L, p. 35.) The



placement of these loading points inside buildings allows for reduction of noise from these sources. Sand tailings are loaded into trucks outside of the process plant, but only from 7:00AM to 7:00PM, as shown in Table 3-7 of the DEIR and discussed on page 36 of Appendix L. Noise generated from proposed operations (excluding temporary construction of the water pipeline) has been found to be less than significant after mitigation. Mitigation Measure 4.10-3 of the DEIR requires a comprehensive noise monitoring program and requires all on-site mobile equipment to be fitted with broad-band “growler” type back-up warning devices rather than conventional “beeper” devices.

#### **Response to Comment Ind 553-4**

Existing traffic and road maintenance are analyzed in the DEIR. Please see Chapter 4.12 of the DEIR. The Project Applicant would be required to enter into agreements with Nevada County and the City of Grass Valley to provide the project’s fair share of funding for maintenance of roadways commensurate with the project’s impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road. (DEIR, Mitigation Measure 4.12-6(c).)

Air quality impacts, including diesel truck exhaust fumes are analyzed in the DEIR. Please see Chapter 4.3 of the DEIR. As stated in the Health Risk Assessment (HRA) performed for the project (see Appendix B of Appendix E.1 to the DEIR), for diesel haul trucks, estimated maximum daily trips were multiplied by 365 days to estimate annual trips. For all other trucks, daily emissions were estimated based on the anticipated maximum daily truck trips, and annual emissions were estimated based on anticipated average trips per week multiplied by 52 weeks per year. Total truck trips assumptions for the HRA are shown in HRA Table 7. Based on the HRA, which includes all construction and operational TAC sources of the project, the health risk to the maximally exposed individual resident (MEIR) would be less than significant after implementation of mitigation.

Noise impacts, including from on-road trucks, are analyzed in the DEIR. Please see Chapter 4.10 of the DEIR.

#### **Response to Comment Ind 553-5**

The commenter summarizes various concerns regarding environmental issues all of which are analyzed in the DEIR. Regarding aesthetics concerns, please see Chapter 4.1 of the DEIR. Regarding electrical energy concerns, please see Master Response 25 – Nevada County Energy Action Plan, and Response to Comment Agcy 8-17. Regarding greenhouse gas emissions, please see Master Response 27 – Greenhouse Gas Emissions.





**Individual Letter 554**

Matt Kelley – Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 95959

04/01/2022

**Ind 554-1**

To Whom it May Concern,

My name is Mary Bennett and I own the home located at 13376 Noel Lane, Grass Valley. My home is less than a mile from the proposed mine site off Brunswick and Bennett Street.

I strongly oppose Rise Mine operation. Having a Foreign operator who has little to no experience running a mine operation is not in anyone's best interest. I firmly believe after seeing all the toxic problems that revolve around mining operation from former years still waiting on Clean Up that the Board would have the best interest in the surrounding Residential community vs some Corporation rounding up investors to move forward.

**Ind 554-2**

Rise has "NO VIABLE Interest in the Community", where as most land and Homeowners do. I also find the need greater for housing or open space for the community to utilize rather than trucks running 24/7 on several busy streets.

The County just approved a large housing development on Brunswick do you think that a having a mining up the street will be a selling point? I would think not. There are better options than mining to move this country forward. Look to the Future and not the past.

**Ind 554-3**

Sincerely



Mary and Stan Bennett

13376 Noel Lane, Grass Valley, CA

(530) 477-9363



## **INDIVIDUAL LETTER 554: MARY AND STAN BENNETT**

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### **Response to Comment Ind 554-1**

The comment does not address the adequacy of the DEIR, but rather expresses general concern regarding the project. Please see Master Responses 1 through 3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 554-2**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3.

### **Response to Comment Ind 554-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



## Individual Letter 555

Matt Kelley, Senior Planner  
950 Maidu Ave, Suite 170  
Nevada City, CA 95959

April 2, 2022

Nevada County Board of Supervisors and Planning Department

I am writing because I have major concerns about the safety of reopening of the Idaho-Maryland Mine. Many of the concerns I have are not addressed in the DEIR or are not comprehensive in addressing them. Well Mitigation Plan is not adequate.

Ind 555-1

I am a homeowner who lives in the mineral boundary. I'm very concerned that the mine will change the flow of ground area through the watershed and my well will be contaminated, have less production or go dry. Because of this, last summer I had a 2600-gallon water storage tank connected to my well. If the water does fail or becomes less productive, I'd have a way to purchase and store potable water immediately. An event and an expense (about \$6000) I don't think I should have had to plan for just in case the mine blasting, tunneling and dewatering removes available ground water or changes where it flows underground.

My background is teaching, science related topics mostly. I have taught 4<sup>th</sup> grade, middle school science, high school sciences including biology, earth science and environmental science. With this basic core knowledge, the reopening of the mine is something I think would be very harmful to the environment and to the citizens of the county. I completely support the DEIR conclusion that the Environmentally Superior Alternative is **"No project (No Build) Alternative would be considered the environmental superior alternative."** (Section 2.4 page 2-7)

Ind 555-2

If your decision is "to proceed with a project that would have significant unavoidable impacts... the decision to balance the benefits of the project against unavoidable environmental impacts must be adopted." (Section 2.4 page 2-4 [page pdf 55](#)) DEIR section 4.0.4 (Introduction to Analysis) defines "significant effect is defined as a substantial or potentially substantial adverse change in the environment." At best Table 2-1 ([pdf pages 134-135](#)) says: "If significant impact is found in any well" for example 10% reduction in the East Bennett group of home wells; then Rise would provide potable water. Nowhere else in the water section does it say what would happen if another significant effect was to develop on the Brunswick/Centennial Drive sites or the bigger 2585-acre mineral boundary area or the larger area that surrounds the mine workings above and below the ground. I couldn't find any criteria for stopping the mine temporarily or permanently dependent on the severity of the effect and its short- and long-term impacts. Why isn't this criteria part of the document?

Ind 555-3

Some of the concerns about water and hydrology include (section 1.8 Comments [PDF page 44](#)):

- Damage to aquifer and watershed
- Lowering of ground water table (*impacting wells*)
- Decrease in water quality
- Blasting damage causing draining of surface water and ground water
- Fire Protection
- Impact of climate change



Ind 555-4

The agricultural and Forestry resources (1.8 pdf page 40) raise concerns about the forest health from reduced ground water and pest infestation to the stress.

Ind 555-5

Nevada County General Plan Policy 17.24 (pdf page 552) says subsurface mining can be conditionally permitted with CEQA passage. The CEQA classifies these significant impacts involving water:

- Violates water standards or waste discharge
- Decreases ground water supplies or interferes substantially with ground water recharge
- Substantially alter existing drainage patterns of the site.

All of these are important concerns for me but the area of possible impact in the DEIR are too narrow in their focus. The scope of the DEIR concerns addressed is the least/minimal amount that Rise chose to consider and not deal with **all** the possible impacts that re-opening might incur.

Ind 555-6

First, I want to focus on the word “site” regarding the possible water impacts. The county policy 17.24 states “subsurface mining shall be conditionally permitted ... only after impacts on the environment and affected surface land uses have been adequately reviewed and found to be in compliance with CEQA. Of particular importance shall be the impact of operation on surface land uses, water quantity and quality, noise and vibration, land subsidence and traffic associated with surface access. All other related impacts shall also be addressed.” I understand “the environment” is the entire mine site where the business is located and involved in above and below the surface. In the DEIR, Rise continually limits the “site” to the area on Brunswick where the shaft is, holding ponds, business offices and processing buildings are proposed to be built above ground. The RISE use of the word “site” also includes the Centennial Road “site” where waste will be dumped. But what the DEIR ignores is the rest of the “site”. Why doesn’t the “site” include at the least all the 2585 acres contained in the mineral boundary? Why aren’t the areas the ground water flows downward prior to being pumped out with dewatering the mine shaft and tunnels included? Why isn’t the watershed(s) from the recharge areas higher in the smaller watersheds that contribute to the groundwater in the 2585 acre mineral boundary included? Why isn’t the entire “environment and affected surface land uses” included in monitoring and evaluation and mitigated solutions if needed?

Ind 555-7

Section 4.8.1 proposes quarterly Rise-generated reports to monitor the significant water related issues. The monitoring will be in a few wells installed in locations of their choice. Where in the DEIR is a list or label map of the wells that are to be monitored? Figure 4.8-4 Map of Domestic Supply Wells and Underground Mine Workings (page 4.8-9 pdf page 632) indicates the wells that have been identified using the State Database and Emgold identification, some which have pump test data. These wells are in the Brunswick and Centennial site, in the mineral boundary and beyond. Peer reviewers found that 15 monitoring wells would be “adequate” to observe for 1 year prior to de-watering (page 4.8-41). That may be considered adequate by Rise’s standards to **minimally** assess but it doesn’t address what is happening in the entire mineral boundary area and adjacent properties. **Why aren’t numerous monitoring wells located throughout the entire mineral boundary site? Why aren’t all domestic wells monitored with real time gaging equipment and regular water quality sampling, not just the ones on or near East Bennett?** I can imagine that my well begins to be less productive and quickly goes dry after dewatering and mining has begun. I report it and the response will be – “How do you know its mining related?” How do I prove it? How do other domestic well owners prove related damages unless the wells are monitored with real time gaging equipment that is interpreted by experts. Would Rise hire



truly independent experts in this area to install the equipment, monitor it and draw conclusions from it? If the County is responsible – where will money for salaries and equipment come from? Surely not out of the current budget, these expenses are over and above the general needs covered in budget. It would make sense that monitoring **all** wells in the mineral boundary is necessary for a year plus for baseline measurements and then regularly during construction and initial and continuing dewatering begins. The needed monitors and expert personnel would be employed by the county, but salary costs paid by Rise.

**Ind 555-8** If the well production is slowed or stopped or the water quality degraded, who will pay for alternative sources of potable water? Rise is installing NID lines for potable water or digging deeper wells for about 30 houses only located on or near East Bennett. (Table 2-1, 4.8-2, page 2-82 pdf page 132) Water use of 400 gallons per average day is paid for by RISE until they are annexed into the city or other termination clauses take effect. Then the cost of the water is the responsibility of the home or business owner, water that was once available on the property at no cost other than well maintenance. But I don't live on East Bennet or the adjacent streets or in an area that already has NID water. I was so concerned and worried that I withdrew funds from my retirement and installed a 2600-gallon water storage tank connected to my well. Should I lose the use of my domestic well, I have a place to store purchased water and it is connected to the pipes to the house. Some of my neighbors could install one should their water source be lost but others couldn't afford the cost. In my part of the county, NID is not available, and it is my understanding that there isn't enough future water available to connect beyond the first mile of Greenhorn that is already connected. Why wouldn't Rise treat all landowners with wells the same as the homeowners in the East Bennett cluster should there be a change in the production and quality of the domestic wells? Will Rise be required to set aside enough money prior to begin the project in case there is an issue with any well related to the mining in the mineral boundary zone at a minimum? (Money to monitor all wells and money to supply a comparable supply of water that their expense)

**Ind 555-9** I have spent some time researching how ground water enters recharge areas and flows underground until it eventually is pumped out from a well or surfaces in a spring, creek or lake. The IMWA proceedings report: Underground mining Drainage, State of the Art, (1998, [www.IMWA.info](http://www.IMWA.info)) states "Underground mining may provoke changes on in-situ permeability and on underground and sink holes, inside the angle of draw, causes the increasing of amount of water inundation and the possibility of mine water and mud invasion". These are negative impacts that affect the internal mine workings but also the ground and groundwater in the surrounding area.

**Ind 555-10** Much of the focus in the DEIR's hydrology section is on specifically named areas in larger survey type reports such as the Basin Plan for the Sacramento River and San Joaquin River Basins. (4.8-13 pdf 654) The Rise DEIR points out that Wolf Creek and its tributaries is not specifically mentioned in this report. But it does include the Bear River. Yet the Bear River system includes the Wolf Creek Watershed as a source of some of its water. Why does specifically identifying areas like surrounding watersheds make them valuable and worthy of water quality objectives, recreation uses and habitat while not naming them makes them unimportant and not useful? The Basin plan calls for looking at 1) water's beneficial uses 2) water quality objectives 3) prohibitions and policy issues 4) monitoring. These objectives should be part of any review regardless of size or naming of the watershed system.

Addressing the concern of





- Damage to aquifer and watershed
- Lowering of ground water table (*impacting wells*)

I was surprised to find the DEIR mostly only examined water issues that were “downhill” from the Brunswick site and not the entire watershed (s). My understanding is that rain and snowmelt are the primary sources of groundwater in the area. Water enters the ground in various recharge areas higher in elevation, soak into the ground and water fills the pores (empty spaces) between soil particles, sands, rocks. The water percolates downward due to gravity and moves laterally down a slope. The water movement may be impacted by less permeable rocks and soils with no to very small pore spaces. The ground water may flow easily if the soil is considered loam or the sub surfaces are highly fractured rock.

This area is a result of former metamorphic processes. The Sierra Nevada mountains and foothills formed as 2 tectonics plates pushed against each other 100 million years ago. Granite and basalt deposits rose through the crust and cooled underground as huge batholiths. As tectonic forces continued, in time the pressure cracked the rocks and quartz and then gold filled some of the cracks before cooling. Not only did dikes of intrusive rock form the gold/quartz veins but also probably other magma-based molten rocks created dikes that also direct the way water flows underground. The tectonic forces cracked and faulted rocks. Layers were probably folded and re-arranged. How the intrusions, faults and fracturing of subsurface igneous and metamorphic layers make predicting how ground water flows unknowable. Section page 4.6-1 ([pdf page 530-1](#)) of the DEIR describes the regional geography as an “assemblage of igneous and metamorphic rocks” and “characterized by the N-NW trending Foothills fault system”. Yet most the assumptions that Rise uses in its discussion assume the underground strata is mostly homogeneous. That is an unproven assumption. The DEIR should re-assess that assumption with on-site research and not make comparisons to other regions as their model for what the underground formations look and act like in relation to ground water.

DEIR states “According to this geologic map, four *rock units* are mapped as underlying the Site. The eastern portion of the Site is mapped as early Mesozoic Lake Combie metavolcanic rock; the northern and western sloping flanks are mapped as early Mesozoic Lake Combie massive diabase; the lower valley portions encompassing the South Fork of Wolf Creek are mapped as Quaternary Alluvium (i.e., water lain sediments); and tertiary clastic strata of the volcanic Mehrten formation is mapped in the south and southwestern portions of the Site.” What about the rest of the mineral boundary site? Having identified the basic types of rocks- volcanic, basaltic (diabase), gravels and sands (alluvium) what does it say about their arrangement underground? I would expect groundwater to easily flow through the alluvium. groundwater would be blocked by the diabase unless it is fractured by the tectonic compression forces, volcanic clastic strata may be from lava flows (? maybe Banner Lava Cap) or lava thrown from the volcanic activity high in the Sierras in the Miocene. Are these layers neat flat strata like you would see in Highway cuts in the Midwest? Highly unlikely based on what can be seen after hydraulic mining stopped eroding away huge hill sides. We don’t know just how these are all arranged, where all the faults are found although one is suspected in the Brunswick site. We don’t know how far ground water percolates down and how fast or slow it moves laterally down from recharge zones. We don’t know if there are contained aquifers, perched water. Where does the underground water actually flow? Considering the loss of wells in North San Juan’s recent gold mining experience, the drilling unexpectedly hit a fault and caused the water to flow differently ruining wells. These dry and/or contaminated wells were a mile from the site. Are we willing to take the chance? I am not, my neighbors and I depend on the water in the ground and from our wells. The loss of water/ damage to



wells/ and shift in how the water flows underground probably won't be exclusive to the Brunswick site. The change in water flow could affect portions of the 2585 acres in the mineral boundary. What happens if the ground water in the areas surrounded by the mineral boundary but not owned by RISE is negatively impacted? What happens if the impact is outside the mineral boundaries? Are these businesses and property owners just out of luck?

IMWA article stated, "Often the wells drainage provokes a significant drawdown of the water table over large areas, producing significant changes on the natural hydrologic balance that can oblige to modify the land usage" (Underground Mining Drainage, State of the Art. IMWA Proceedings, p. 96). Dewatering the mine, draining the water level from 260' bgs to 3200'bgs is the same as "wells drainage" and will act in the same way as the described.

I imagine that the top of the water "table" in the 2585-acre site is mostly slanting downward as water enters higher up in the watershed and due to hydraulic pressure (percolates) and gravity moves through pores, along faults and moves generally from high to lower levels. It's an *equilibrium* as a certain amount of water soaks in from the melting snowpack and it percolates down through the soils and underground matrix and eventually enters streams and springs coming to the surface in a similar amount (with seasonal fluctuations). In 2018 EMKO observed seepage into the New Brunswick shaft (pdf page 642) and it *assumes* seepage in is equal to the amount leaving the drains. But is this balance going to continue once the tunnels and shaft are emptied as projected for the maintenance dewatering for the life of the mine? On page 4.3-103 (pdf 395) the DEIR states: "*Ground water continually flows into the underground mine. If the water is not pumped out, the water would very quickly flood the lowest tunnels.*" The snowpack will continue to melt and drain into the recharge areas but adding the constant pumping out water in the shaft and in the tunnels in addition to the current natural amounts of water drifting downward, equilibrium no longer exists. As excessive amounts of water are pumped out then the water table will be drawn down. The drawdown impacting wells along Bennett have already been identified as at risk. But what about wells that are outside this small area? As water table drops in the assemblage of mixed layers, fractured rocks and soil and pebble mixes, different areas can be affected differently. The shallower the well, probably the more affected change due to the underground water flow and/or the water table vertical height is lowered. Table 4.8-10 (pdf page 679) indicates that 99% of the ground water inflow into the mine is estimated to occur within 600 feet of the ground surface. My well ends before 600 feet below the surface. Will people like me lose their water source because as the mine water is pumped, groundwater will more easily flows into the dewatered tunnels to be pumped out quicker. Dewatering is a risk to changing the ground water supply, lowering the water table and damaging the watershed.

The estimated amount of water in the current mine is about 385 million gallons (pdf page 665). The initial dewatering will drop the water in the shaft (and surrounding areas) from 250 feet bgs (below ground level) in the shaft to 3200 ft bgs. As this water is pumped out, more groundwater will flow in and collect to be pumped out. As the tunnels and shaft are pumped out, water from the upper levels will continue to flow in but deep waters stored in the base of water table are also drawn into the emptying mine workings to be pumped out and lowering the water table even more. Consider that historically the rate of dewatering the Brunswick Mine was 720 gpm (gallons per minute) to 800 gpm over 90 days. Rise wants to pump 3,600,000 gallons per day at the rate of 2500 gpm. What effect will this have on how the ground water flows through the surround land and enters the mine openings? What is the effect on the water table height not only under the Brunswick site but throughout the 2585-acre mineral boundary

Ind 555-11

Ind 555-12



- area? How will this rapid removal affect the rebound/refill rate of the soils close to the underground mine workings and throughout the mineral boundary? How will this affect the dynamics of the cone of depression that is created when the water leaves existing higher-pressure areas in the underground surfaces and then creates lower-pressure areas as it flows out of the mine workings? Will the flow increase in speed as now there isn't any water in the shaft and tunnels to push back on entering water? There is no longer an equilibrium of water in and out of the mine workings? The North San Juan mining disaster created an ever-widening cone of depression and drew more and more water into it and away from the natural pathways. Many lost their wells. Are we willing to risk this?
- Ind 555-13** Seismic stability in tunnels is a concern cited in the Geology, Soils, Mineral Resources section 1.8 (pdf page 43). Significant risk comes from the impact of blasting, creating new fissures and cracks in the walls of the new and old tunnels. Groundwater flowing into the mine may find new and different drainage pathways leaving former areas with less water available. The blasting and removal of rock may open new pathways flooding the mine and draining surrounding upper ground water levels in the watershed, not just under the Brunswick Industrial Site. What provisions have been developed for this loss of groundwater below the ground for wells and above the ground for habitat?
- Ind 555-14** With the mining in this area since 1860s, there has been no observable movement of any faults (4.6-4 pdf page 533) but with the new blasting that will occur with reopening, will faults be shifted? DEIR (pdf page 534) states there is an *inferred* fault within 600 ft of shaft. How long is it? How deep is it? what type of fault is it? Does it affect or direct the underground water flow? If it "slips", what will be the range of changes in subsidence and in underground water flow? There are so many un-answered questions not asked or addressed in the report. The DEIR reports that it shows no recent movement. But with the pressure of the ground water removed as the dewatering drops the water table about 2500 feet will it continue to be stable? Will it be stable as blasting begins even at deep depths? There is not any mention of how to monitor this potentially dangerous situation.
- Ind 555-15** Because of the complex geologic nature of this area, conceptual models are difficult to use. It is necessary to have a "full understanding of the lithological, structural, metalgenetic and hydrogeologic information (IMWA proceedings, p. 109). As I read the first EIR and now the second DEIR, I find that often the data is **limited** historic data or limited representations of focused recently collected data that often doesn't include much of the 2585-acre site. The Predictive simulations of Underground mine workings only estimate what might happen for the next 25 years (pdf page 661). What about the next 55 years? How much of the simulations are rough estimates from other mining experiences and how much is best guess because what is exactly structures and formations underground is only a guess. I wonder how my neighborhood will look with water table much lower; people drilling for wells much deeper but finding that they are now in the 1000' deep drilling areas that are contaminated by blasting residual materials that are miscible in water.
- Ind 555-16** Why did Balance Hydrologic Inc test discharge samples for water quality only 3 times – Sept 2019, Dec 2019 and Jan 2020 and EMKO on Dec 2018 and 2019? (4.8-39 pdf page 661) Why so few? Why not have tests indicating year-round results over at least several years with seasonal variation? IMWA proceedings state, "to implement confident mathematical models, it is extremely important to have sufficient hydrogeologic data and hydraulic parameters" (page 109).
- Ind 555-17** Similarly Graph 4.8.5 (page 4.8-13 pdf page 636) is a comparison of New Brunswick shaft levels with rainfall. Having taught science and the importance of data as evidence I wondered why there is so little data?





Ind 555-18

Only 2 rainfalls in such a short data collection period? I wanted to know if the ground had been dried out at the end of the long summer causing much of the rainwater to seep in and fill the pores or if the ground had been saturated so that the rainwater flowed into the shaft? Is this lack of details and clarity about the data used typical of RISE and its “experts”? Is there enough data collected and is collected using high standard in collection and interpreting the data? Even if it doesn’t necessarily support RISE’s point of view?

For all these reasons and more, the dismissal of the concern about decreasing ground water supplies or interfering substantially with ground water recharge with mitigation is less than significant is inappropriate (4.8.2, page 4.8-54 pdf page 677). Given the mine’s operation probably won’t disturb recharge because that happens higher up with snowpack melt and seasonal rains. But decreasing ground water across the entire 2585-acre site is complicated and its cumulative. The concern is how much will be removed and how the water table height will be impact. The concern centers on having less well productivity to total loss of the well to contamination. These aren’t even addressed by Rise. Their focus highlighted that the project is not in a “basin” that’s identified by DWR so continual quality groundwater to neighbors isn’t an issue. Reducing soil groundwater is not addressed either. With a dropping water table, soil moisture that plants depend on is likely to be drawn down causing plants to be negatively impacted. Stressed trees are more likely to develop insect infestations like Bark Beetle. Stressed and dead vegetation significantly add to the risk of wildfire.

The water related issues are enough to not approve the re-opening of the mine. The kind of environmental damage that dewatering could cause is not “fixable”. It takes water out of the surrounding area and risks draining wells and drying out the natural environment causing vegetation and trees to be stressed and die. This area is already high risk for wildfire, this would increase that risk substantially.

If your vote is to downplay these risks and more, then the EIR and authorizations concerning water should include:

Ind 555-19

- The entire 2585-acre site should be the minimum that is tested and monitored at Rise’s expense for water quality, recharge, well production and ground water heights.
- Action Plans should be indicated if there are negative impacts in areas that are surrounded by or adjoin the mineral boundary as well.
- Fully assess the underground structure of the 2585-acre site to better determine the flow of ground water and how dewatering will impact the habitat and wells.
- State what damages will cause the mining authorization to be halted and be revoked permanently.
- Collection of more baseline data is needed for at least 1 to 3-year prior to granting permission to reopen so seasonal changes can be verified and more locally collected data can be collected and analyzed. This includes monitoring all wells throughout the entire mineral boundary for productivity, water quality and water table height of well water; soil moisture as it impacts vegetation in seasonal changes; discharge to the Wolf Creek watershed system including close to the drains openings and intervals downstream. This is not a complete list of the data that should be collected and reviewed.
- Cause Rise to set aside sufficient financial resources to **truly** pay for damaged wells and environmental cleanup should there be a negative impact due to mining. Bankruptcy would not



**Ind 555-20**

be an option should a disaster occur nor would selling the mine to another entity. Financial resources would have to continue beyond the 80-year proposed life of the mine operation.

- Instruct the County to seek out and hire hydrology related experts to install all types of monitoring equipment (such as gaging monitors, piezometers, thermologs, water quality assessments at drains, etc) across entire site, develop an action plan for routine monitoring-daily, weekly, monthly depending on instrument; and develop an action plan for shutting down part or all the mining process should significant changes be identified. Although the County hires and directs this department, Rise is responsible for all associated costs.

I think the adage: Hope for the best and plan for the worst is critical to regional environment is to survive should the re-opening be somehow approved. But this DEIR is inadequate. It's a case of hope for the best and don't plan for anything else.

Respectfully,

Mary Ann Coleman  
14063 Greenhorn  
Grass Valley, CA 95945





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## **INDIVIDUAL LETTER 555: MARY COLEMAN**

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### **Response to Comment Ind 555-1**

The commenter states that the Well Mitigation Plan is inadequate and is concerned about well production and groundwater quality. Please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The commenter's opposition to the project is noted for decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 555-2**

The commenter asks what actions would be taken if another significant effect (related to water) was to develop on the Brunswick or Centennial sites or above and below the mineral rights area and what criteria would stop the mine temporarily or permanently. Please see Master Response 7 - Location of Future Mining Areas, Master Response 8 - Mine Waste Characterization, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 32 - Temperature of Mine Water Discharge, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 3 - Operator Responsibility. The County has authority to enforce all conditions of approval and mitigation measures that are included in the DEIR. In the case of a violation, such as an impact to water wells where the operator failed to immediately replace water supply, as required under Mitigation Measure 4.8-2(b), the County would have authority to force compliance and/or to suspend or revoke the Mine's permits.

### **Response to Comment Ind 555-3**

As discussed on pages 15-19 of Appendix M, numerous holes must be drilled and blasted sequentially into a void (the free face) in order to fracture rock and create mining excavations. Any blast damage to surround rocks, such as cracks, would be limited to a few feet surrounding the excavation. Therefore, blasting cannot "damage the aquifer" or cause draining of surface water and groundwater.

With regard to groundwater and watershed impacts, please see Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 8 - Mine Waste Characterization, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 32 - Temperature of Mine Water Discharge, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 16 - Drought and Climate Change.

With regard to fire protection, please see Chapters 4.7, 4.11, 4.13 of the DEIR and Master Response 6 - Wildfire Impacts. The project's emission of greenhouse gasses and incremental contribution to climate change is addressed in Chapter 4.3 of the DEIR.

### **Response to Comment Ind 555-4**

The commenter refers to pdf page 40, which is Page 1-10 of the DEIR. This page summarizes concerns brought forth in comment letters received during the Notice of Preparation of the DEIR, including potential insect infestations due to stress of local forests. The commenter provides no evidence that mine dewatering would result in stress to local forests which would result in insect infestations. Mine dewatering would not significantly impact groundwater dependent vegetation. Please see Master Response 33 - Groundwater Dependent Vegetation.



### **Response to Comment Ind 555-5**

The commenter states that the DEIR does not address all possible impacts that re-opening of the mine might incur, but provides no specifics on what impacts they believe were not analyzed in the DEIR. Please see Responses to Comments Ind 555-3 and 555-4.

### **Response to Comment Ind 555-6**

The groundwater model considers an area much larger than the mineral rights boundary. As stated on page 13 of Appendix K.3, the groundwater model domain encompasses approximately 2,810 square miles, and the finite-element grid contains 324,448 nodes and 626,386 elements within 31 layers. Please see Appendix K.3 and Figure 4-5 of Appendix K.3 of the DEIR. The model also considers the hydraulic conductivity of regional and local geological units (please see Figure 4-1 of Appendix K.3). In addition, please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Nonetheless, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps A101, A201 and A202), as shown in Appendix A to this Final EIR.

### **Response to Comment Ind 555-7**

Appendix K.8 of the DEIR provides a map of proposed monitoring well locations. Please see Figure 1 of Appendix K.8. Monitoring wells specially constructed for this purpose are proposed rather than domestic water wells and monitoring includes “real time” gauging equipment and regular water quality sampling. The applicant is required to fund all required well monitoring, which would be conducted by qualified hydrologists. Mitigation Measure 4.8-2(a) requires submission of reports to the Nevada County Environmental Health Department. With regard to the commenter’s request that the area of well monitoring be expanded and that domestic wells be monitored, please see Chapter 4.8 and Appendix K.8 of the DEIR, 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells, inclusive of water level and water quality, within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

### **Response to Comment Ind 555-8**

The applicant would pay for any required well mitigation under the Well Mitigation Plan, Mitigation Measure 4.8-2(b) of the DEIR, and General Plan Policy 17.12. The Well Mitigation Plan has been modified to clarify the range of actions which would be taken outside of the E. Bennett Road area – Please see Appendix D to this Final EIR. Please also see Master Response 15 - Adequacy of Groundwater Monitoring Wells.



### **Response to Comment Ind 555-9**

The report referenced by the commenter discusses underground coal mines in Spain. Underground mining would not change the permeability of the rock surrounding the mine workings (please see Response to Comment Ind 555-3) and the increased permeability due to the creation of new mining voids is specifically analyzed in the groundwater model and DEIR. Please see Appendix K.3 and Figure 5.1 of Appendix K.3 of the DEIR. Underground mining would not cause “sinkholes”, see Master Response 29 - Near Surface Workings.

### **Response to Comment Ind 555-10**

The Regional Water Board adopted a Water Quality Control Plan, Fifth Edition, for the Sacramento and San Joaquin River Basins (hereinafter Basin Plan) that designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan. The Basin Plan at page 2.3 states that the “...beneficial uses of any specifically identified water body generally apply to its tributary streams.” The Basin Plan does not specifically identify beneficial uses for South Fork of Wolf Creek but does identify present and potential uses for the Bear River, to which the South Fork of Wolf Creek and Wolf Creek are tributary. Please see page 4.8-31 of the DEIR. The DEIR considered the beneficial uses for the Bear River with regard to potential impacts to South Fork of Wolf Creek and Wolf Creek.

With regard to the consideration of the regional groundwater flow, please see Response to Comment Ind 555-6. The groundwater model does not assume the underground strata is homogenous. Please see Appendix K.3 of the DEIR and Master Response 14 - Adequacy of Groundwater Model.

With regard to the adequacy of the groundwater model and mitigation, please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. The mine operator would be responsible for replacing water for impacted water wells even if they are beyond the limit of the mineral rights area, if such impacts are caused by the mine pursuant to Mitigation Measure 4.8-2(b) and General Plan Policy 17.12.

### **Response to Comment Ind 555-11**

The analysis in the DEIR determined that 7 wells would be impacted by dewatering in the East Bennett Road area, and that other wells throughout the region would not be significantly impacted. With regard to the adequacy of the groundwater model and mitigation please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment 555-12**

The analysis in the DEIR determined that 7 wells would be impacted by dewatering in the East Bennett Road area, and that other wells throughout the region would not be significantly impacted. With regard to the adequacy of the groundwater model and mitigation please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 555-13**

Please see Responses to Comments Ind 555-3 and 555-9. Please also see Master Response 33 - Groundwater Dependent Vegetation.



#### **Response to Comment Ind 555-14**

The commenter asserts that the DEIR should have evaluated the project's potential to activate local faults and induce seismic activity due to the removal of rock and mine dewatering. However, the magnitude of the mine rock excavation and placement is far smaller than the magnitude of the mass of bedrock underlying the site. The magnitude of the energy released during mining excavations by rock removal and rock placement is much smaller than the magnitude of energy activation required to trigger the release of a local pre-Holocene fault. No analysis was performed nor is necessary, as there is no potential for inducement of seismic activity on these faults from the proposed mining activity. Please see NV5 Memo attached to the Final EIR as Appendix P.

#### **Response to Comment Ind 555-15**

The commenter asserts that the DEIR is flawed because the data used to analyze impacts is limited and a "full understanding" is necessary. However, it can always be argued that more data should be obtained, and the data used for any analysis is by definition "limited" to the scope of that data. In this case, the data used to assess dewatering impacts included historic and current data points, which were peer-reviewed by the County's independent expert and found to be adequate as a basis for the analysis. As stated by California courts, "the need for thorough discussion and analysis is not to be construed unreasonably... to serve as an easy way of defeating projects. Absolute perfection is not required." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d at p. 406.) With regard to the adequacy of the groundwater model and mitigation, please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

#### **Response to Comment Ind 555-16**

Please see Master Response 35 - Discharge to South Fork Wolf Creek, with regard to the number of samples taken. Please also see Response to Comment Ind 555-15 regarding the request for more data.

#### **Response to Comment Ind 555-17**

Figure 4.8-5 of the DEIR shows a graph of rainfall for entire water years which aggregates all rainfall events in each water year.

In regard to the adequacy of the groundwater model and mitigation, please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

#### **Response to Comment Ind 555-18**

Please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 - Drought and Climate Change, and Master Response 33 - Groundwater Dependent Vegetation.

#### **Response to Comment Ind 555-19**

Please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 - Drought and Climate Change, and Master Response 33 - Groundwater Dependent Vegetation.



**Response to Comment Ind 555-20**

The commenter generally states the DEIR is inadequate. Responses to specific comments are provided above.





**Individual Letter 556**

**From:** Mary Good <coachspirit@yahoo.com>  
**Sent:** Monday, April 4, 2022 9:38 AM  
**To:** Idaho MMEIR  
**Subject:** I oppose the Idaho-Maryland Mine

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To: Matt Kelley, Senior Planner, Nevada County Planning Department:

**Ind 556-1**

I am against reopening the Idaho-Maryland Mine, for a variety of reasons. As a resident who chose to retire to this county especially for it's beauty and tranquility, I am appalled that the County would be considering entering into an agreement with Rise Gold to open the mine.

**Ind 556-2**

The history of gold mining has demonstrated that the resulting environmental degradation is not worth the undertaking. This mine poses numerous potential risks to the water table, to our pristine creeks, as well as the ensuing noise and increase in air pollution are alarming to me. The threat to the water table makes no sense during our historic drought.

**Ind 556-3**

As many have noted, the allure of our County and its primary economic driver is tourism. People are drawn to our beautiful foothills to escape the noise of the city. But we are not the only foothill community they can choose to visit. I believe an active mine is a risk to this tourist trade.

Please note my opposition to this endeavor. Thank you.

Mary Good  
Grass Valley CA



## **INDIVIDUAL LETTER 556: MARY GOOD**

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### **Response to Comment Ind 556-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2 for the commenter's social concerns. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 556-2**

For concerns related to water table and drought, please see Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Air pollution is addressed in Chapter 4.3 of the DEIR, and Noise is addressed in Chapter 4.10. Based on the project-specific noise analysis, none of the individual or combined activities associated with long-term operations of the proposed project are projected to generate noise in excess of the applicable noise standards. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 is included out of an abundance of caution to ensure satisfaction with such standards and to reduce the potential for annoyance resulting from the proposed project to the maximum extent feasible. MM 4.10-2 requires implementation of an ongoing comprehensive noise monitoring program under County oversight. If operational noise levels are found to exceed the applicable County noise standards, the County shall require cessation of the mine operations until additional engineering controls can be implemented.

Please see Master Response 35 – Discharge to South Fork Wolf Creek, for concerns related to creeks.

### **Response to Comment Ind 556-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 557**

2/25/2022

Nevada County Planning Department

950 Maidu Ave.

Nevada City, CA 95959-8617

**Ind 557-1**

Dear Matt Kelley,

I wrote to you in 2020 and my concerns for the proposed re-opening of the Idaho Maryland Mine by Rise Gold have only increased over the last 2 years!

My concerns are as follows:

**Ind 557-2**

\*The dewatering of the existing underground mine workings and the hydrologic threat that it poses to domestic/residential wells, the impact on existing waterways/creeks, and the negative impact on water quality. The “treated” water entering the south fork of Wolf Creek will contain contaminants.

**Ind 557-3**

\*The creation of new underground mine workings which will require drilling and blasting that may result in the destabilization of rock fissures that are currently providing water to wells. Not to mention the strong potential for a catastrophic explosion and potential loss of life!

**Ind 557-4**

\*The processing of gold mineralization and rock will cause noise and air pollution in nearby residential areas.

**Ind 557-5**

\*The placement of engineered fill that is unstable will require utilization of compaction equipment and that in turn will create more noise pollution and ground disturbance.

**Ind 557-6**

\*The off-site export of fill will create traffic and noise problems and the idea that the fill will support local construction projects is ludicrous. In addition, during a wildfire evacuation, the residents attempting to leave will be dramatically impacted if they are forced to intermingle with the trucks using the same route!

**Ind 557-7**

\*The limited construction of a potable water pipeline to residences ONLY on a portion of East Bennet is narrow in scope! The real impact could be damaging for miles. A bond would have to be floated and NID would have to address the water needs-is NID prepared to take this on? Residences could go without water for years!

**Ind 557-8**

\*Identified wells on the Groundwater Hydrology and Water Quality Analysis Report, particularly Section 4.2.2.3 and Table 4-4 appears narrow in scope. Once again many wells outside the defined areas in this report could be effected and even a slight drawdown of one’s well water is significant, especially in drought years.



**Ind 557-9**

\*The reports use qualifying verbiage such as “predicted, largely confined, average, base flow rates, light-industrial, minimize potential etc.” is that verbiage being used meant to minimize Rise Gold’s responsibility when damage occurs? The answer is a resounding yes!

**Ind 557-10**

\*The U.S. Department of Labor Fatality Reports: Mine Safety and Health Administration under Metal/Non-metal Fatalities that in 2020 there were 24 deaths of the 231,185 miners working in that field. That number indicates that there’s obvious danger, is Rise Gold ready for fatalities? Many of the deaths were in the haulage process, in other words, driving fatalities!

**Ind 557-11**

\*Rise Gold requested a variance on building height from the current 45 feet to 165 feet. That will be an eye sore to everyone!

**Ind 557-12**

\*The damaging effect on home values will be incalculable. Home values will drop overnight by hundreds of thousands of dollar, especially within a 10 mile radius of the mine. Tax revenue will be impacted.

**Ind 557-13**

We have lived in Nevada County for 50 years and love this community, however, in speaking with many of our neighbors, between the fire danger and rising home owner insurance costs, Rise Gold will be the last straw that will force us to move.

Please consider your current tax paying residents as your most important asset, not Rise Gold!

Thank you,

Mary Lee

PO Box 782

Cedar Ridge, CA 95924

530-272-1651



## **INDIVIDUAL LETTER 557: MARY LEE**

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### **Response to Comment Ind 557-1**

This comment is introductory in nature and does not discuss the adequacy of the DEIR. Comment noted.

### **Response to Comment Ind 557-2**

The commenter is concerned about the dewatering of the Idaho-Maryland Mine and impacts to the South Fork Wolf Creek due to the discharge of treated water. The commenter is referred to Chapter 4.8 of the DEIR (Hydrology and Water Quality), which found that the impact to groundwater wells from the dewatering of the mine to be less than significant after mitigation. (DEIR, p. 4.8-54.) The DEIR also found that any impacts associated with the discharge of treated water into South Fork Wolf Creek would be less than significant after mitigation. (DEIR, p. 4.8-41.) The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 557-3**

The commenter states that the creation of new underground mine workings will result in the destabilization of rock fissures providing water to wells and that the underground blasting may result in the loss of life. As discussed on pages 15-19 of Appendix M (Blasting Report), numerous holes must be drilled and blasted sequentially into a void (the free face) in order to fracture rock and create mining excavations. Any blast damage to surround rocks, such as cracks, would be limited to a few feet surrounding the excavation. Therefore, blasting cannot “damage the aquifer” or cause draining of surface water and groundwater.

The hazard from the use of explosives is analyzed in Chapter 4.7 of the DEIR and the impact is less than significant after mitigation. (DEIR, p. 4.7-22.) Specifically, the DEIR found that numerous state and federal regulations have made the use of explosives underground mining projects extremely safe two incidents in the past 25 years. (DEIR, p. 4.7-28.)

### **Response to Comment Ind 557-4**

The commenter states that the gold mineralization process will cause noise and air pollution but does not provide further information. The DEIR analyzes air quality impacts in Chapter 4.3 and noise impacts in Chapter 4.10. Impacts for both categories (with the exception of one temporary noise related impact) are less than significant after mitigation. For example, mineral processing noise is evaluated on page 4.10-38 of the DEIR and found to be less-than-significant (i.e., below the County’s applicable noise standards). The only noise-related impact that would be significant and avoidable would be the installation of the potable water pipeline along East Bennett Road. (DEIR, p. 4.10-30.)

### **Response to Comment Ind 557-5**

The commenter states that the placement of engineered fill will create noise pollution. The DEIR found that noise from compaction of engineered fill is less than significant after mitigation. (DEIR, p. 4-10-31.) The DEIR also found that disturbance of ground (vegetation communities, wildlife, wetlands) from placement of engineered fill is less than significant after mitigation. (DEIR, p. 4.4-57.)

### **Response to Comment Ind 557-6**

The commenter states that the hauling of engineered fill will create adverse noise impacts. The commenter also claims that it is “ludicrous” to assume engineered fill will be used for local





construction projects but does not provide additional information. The commenter also states that truck traffic from the project would impede an evacuation during a wildfire. The DEIR found that noise-related impacts resulting from traffic would be less than significant after mitigation. (DEIR, p. 4.10-31, 37.) For example (DEIR, p. 4.10-37,38):

As part of the Noise and Vibration Analysis prepared by BAC, maximum heavy truck traffic noise levels were assessed for the delivery of engineered fill material to off-site vendors via SR 20/49. The analysis assumed 200 heavy truck trips per day (100 round trips) and employee trips, as previously discussed.

Table 4.10-16 presents the existing ambient noise levels and anticipated existing plus-project traffic noise levels at the nearest residences to each roadway segment, as well as the project-related increase in traffic noise levels and the impact assessment threshold for each roadway segment based on the criteria presented in Table 4.10-5.

As shown in Table 4.10-16, the traffic noise level increase from the transport of fill from the Brunswick Industrial Site to the highway and from employee commutes would not exceed the applicable thresholds of significance at any of the receptors. Therefore, noise-related impacts from off-site heavy truck and employee traffic would be less than significant.

Regarding the assertion that engineered fill would not be used in local construction projects, the commenter is referred to Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets. The commenter is also referred to Master Response 5 - Evacuation Zones regarding the impact of the project on evacuations.

#### **Response to Comment Ind 557-7**

The commenter states that the DEIR is too narrow in scope by only proposing NID service to 30 residences on East Bennet Road. The commenter is referred to Master Response 7 - Location of future mining areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

#### **Response to Comment Ind 557-8**

The commenter states that the DEIR underestimates the number of private wells that could be impacted by the dewatering of the mine, especially in times of drought. The commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

#### **Response to Comment Ind 557-9**

The commenter asserts that certain language within the DEIR is intended to insulate the Project Applicant from liability. The DEIR provides an analysis of project impacts in accordance with the requirements of CEQA. The DEIR does not minimize or otherwise insulate the Project Applicant from liability. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.



**Response to Comment Ind 557-10**

The commenter cites statistics from the federal Mine Safety and Health Administration. This comment does not address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues.

**Response to Comment Ind 557-11**

The commenter states that the project will result in a 165-foot structure with adverse aesthetic impacts. The DEIR analyzed aesthetic impacts in Chapter 4.1. The DEIR found that the 165-foot-tall headframe for the Brunswick Site would contribute to a significant and unavoidable aesthetics impact. (DEIR, p. 4.1-15.)

**Response to Comment Ind 557-12**

The commenter states that the project will adversely impact home values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

**Response to Comment Ind 557-13**

The commenter states that the fire danger and rising homeowner insurance costs as a result of the project will force longtime residents to leave the area. The DEIR analyzed wildfire impacts in Chapter 4.13 and found the impacts to be less than significant with one impact requiring mitigation (DEIR, p. 4-13.2.) Regarding property values, the commenter is referred to Master Response 2 - Social and Economic Impacts.



**Individual Letter 558**

Mary Padua  
PO Box 2013  
Nevada City , Ca 95959



Nevada County Planning Dept.  
Attn: Matt Kelly  
950 Maidu Ave, Suite 170  
Nevada City , Ca 95959

Regards: Idaho Maryland Mine Project

Dear Sirs:

**Ind 558-1**

This letter is support of NOT approving the Idaho Maryland Mine Project.

We are such a drought right now and the use any water to towards mining should be nixed right now . Our community is a scary place of many of us losing our wells to lack of water .

**Ind 558-2**

The truck loads of waste from this project will impact our roads and well being of the community safety.

**Ind 558-3**

If you decide to vote yes for this project to continue , I would be terrified to see the out come the future holds , for this little community who loves where live.

I beg of you to please please do not let this crime happen here in our beautiful community.

With Respect for our future

Mary Padua

A handwritten signature in black ink, appearing to read "Mary Padua".

marypadua@yahoo.com



## **INDIVIDUAL LETTER 558: MARY PADUA**

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### **Response to Comment Ind 558-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 558-2**

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the Project Driveway and Brunswick Road. (DEIR, p. 4.12-91.)

### **Response to Comment Ind 558-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 559**

Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

April 3, 2022

Dear Mr. Kelley,

I am writing today in opposition of the proposed re-opening of the Idaho Maryland Mine in Grass Valley. I have lived and worked in the county for 20 years including raising my family here. I will address my concerns from the DEIR about the proposed impacts on Air Quality, Section 4.3 in the county.

**Ind 559-1**

My understanding is that the DEIR substantially underestimated emissions of air pollutants and green house gases from trucks hauling engineered fill from the Bruswick site to offsite locations. Remediation of the Centennial Site was not included in the CEQA analysis for the project, so it cannot be used to understand the impact of daily truck hauls with engineered fill. The haul trucks will have to go to farther away dump sites. The NOx emissions would be substantially higher than what is stated in the DEIR and exceed the Northern Sierra Air Quality Management Districts threshold.

Additionally, the mitigation measures in the DEIR only address the first year during construction of the project, not the entire 80 years of the project. Therefore, longterm mitigation of NOx, ROG, and PM10 is not addressed for the 80 year proposed life of this project.

**Ind 559-2**

The air quality in Western Nevada County is already bad enough at certain times of year with the upwind drift from Sacramento and summer forest fires. Adding any additional air pollution will wreak further havoc on the lungs of Nevada County residents.

These two aspects of the degradation of air quality in the county need to be adequately addressed.

Thank you,

Mary Peterson  
311 Park Ave.  
Nevada City, CA





## **INDIVIDUAL LETTER 559: MARY PETERSON**

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### **Response to Comment Ind 559-1**

Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

### **Response to Comment Ind 559-2**

The comment expresses a general opinion that the mitigation measures only apply to the first year of project construction.

Please see Master Response 19 – NSAQMD Criteria Pollutant Thresholds During Operations.



**Individual Letter 560**

Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Ave. Suite 170  
Nevada City, CA. 95959-7902

<b>Ind 560-1</b>	Dear Matt Kelley,  We are all very lucky to live in Nevada County with its fresh mountain air, beautiful forests and the Yuba River running through it. It is very precious and we need to do all we can to preserve it. I am very concerned about the planned reopening of the Idaho Maryland Mine. The DEIR report that was submitted has several flaws and issues that do not tell the true impact that the mine will have on Grass Valley and Nevada County. How can the mine be approved with all of these mistakes in the report?
<b>Ind 560-2</b>	The ground water model has flaws in the initial start point and baseline data assumptions. The entire analysis is thrown off because of this.
<b>Ind 560-3</b>	There needs to be more management than is in the report regarding dealing with the mine waste. Asbestos is a huge problem, the report needs to state how it will be dealt with.
<b>Ind 560-4</b>	The report does not include any information on cleaning up the Centennial Mine site. This is the site where the mine waste will be dumped. It is required by the California Environmental Act to be included in the DEIR report.
<b>Ind 560-5</b>	Missing construction times estimates throw off the entire analysis of noise, traffic and air.
<b>Ind 560-6</b>	There is a significant threat to the water supply for wells in a much larger area than is identified in the DEIR report. How could pumping out one million gallons of water a day not have a negative impact on the community? Besides many wells running dry what impact will this have on Wolf Creek and the aquatic life? The change in water temperature and the loss of stream bed and stream bank habitat will have a big impact. The draw down of the local water table has not been studied. What impact will it have on wet land, meadow and forest habitats?
<b>Ind 560-7</b>	These are just a few of the flaws in the DEIR report. The Idaho Maryland mine's reopening should not be approved for many reasons. This flawed report is one major reason. The county needs to know what the consequences of opening the mine would be. This report does not give an accurate analysis of opening the mine.
<b>Ind 560-7</b>	A concerned resident of Nevada County,  Mary Lou Swagerty 14296 Tahoe View Drive Grass Valley, CA 95945 mlswagerty@gmail.com



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## **INDIVIDUAL LETTER 560: MARY SWAGERTY**

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### **Response to Comment Ind 560-1**

The commenter is generally opposed to the project and notes that the DEIR contains numerous mistakes. The commenter's opposition to the project is noted for the decisionmakers. Responses to specific comments are provided below.

### **Response to Comment Ind 560-2**

The commenter states that the DEIR's Groundwater Model is flawed due to initial start date and inaccurate baseline assumptions but does not provide additional detail. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model.

### **Response to Comment Ind 560-3**

The commenter states that the DEIR must discuss how asbestos will be managed. The DEIR states that asbestos-related impacts would be less than significant after mitigation. (DEIR p. 4.3-80.) The commenter is referred to Master Response 22 - Conservatism of Asbestos Assumptions, and Master Response 23 - Adequacy of Asbestos Sampling.

### **Response to Comment Ind 560-4**

The commenter states that the DEIR must include a discussion of the remediation cleanup of the Centennial Industrial Site. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

### **Response to Comment Ind 560-5**

The commenter states that missing construction time estimates from the DEIR skew the analysis of several project impacts. The commenter is referred to Master Response 24 - Project Construction Schedule.

### **Response to Comment Ind 560-6**

The commenter states that project will adversely impact groundwater wells in areas beyond those identified in the DEIR, that the discharge of treated water will impact aquatic resources, and that discharge will affect the temperature of surface water. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 33 - Groundwater Dependent Vegetation. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

### **Response to Comment Ind 560-7**

The commenter states that the project should not be approved. The commenter's opposition to the project is noted for decision makers. The Commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.



**Individual Letter 561**

**From:** [maryannemurphyesq](mailto:maryannemurphyesq)  
**To:** [Heidi Hall](#); [Matt Kelley](#)  
**Subject:** Anti Idaho Maryland Mine - YouTube  
**Date:** Friday, March 4, 2022 2:31:36 PM

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<https://m.youtube.com/watch?v=dMUvb1oksZg>

**Ind 561-1**

This mine does not fit the county's plan. How can an 80 year permit that mines the MotherLode fit the plan. You do it for 1 you more will come and change forever the landscape of these Communities. Those who vote "yes" to an 80 year permit should be honest about what it will mean to the communities.

Maryanne Murphy  
Woodstock Drive



## **INDIVIDUAL LETTER 561: MARYANNE MURPHY**

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### **Response to Comment Ind 561-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 562**

**From:** maryannemurphyesq <themislaw@protonmail.com>  
**Sent:** Thursday, March 24, 2022 8:06 AM  
**To:** Matt Kelley, Planning; BOS Public Comment  
**Cc:** Heídi Hall  
**Subject:** DEIR- RiseGold Application

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Dear Planning Commission and Board,

I am a real estate broker as well as a lawyer.

**Ind 562-1**

The application at issue is an 80- year plan to mine gold within claimed mineral boundary rights. Yet, the DEIR does not address what happens to the neighborhoods and commercial developments within those alleged and claimed rights if they are explored by the mining company.

So, the picture would be mining under developed commercial and residential neighborhoods since the mid 20th Century which may even involve the airport and Dignity Health.

How many buyers do you think would buy a home or business with 365 days per year 24/7 gold mining going on under the property.

**Ind 562-2**

Can you see a fire insurer insuring property with abnormally dangerous activity and product beneath it? I think the insurance risks are insurmountable. Consider the Colfax fire of last year. Just having a nearby fire threat to such an operation would need to consider expanding the scope of community evacuations.

**Ind 562-3**

We live in a densely populated area where nearly 1/3 of the people in the County reside as between the 3 communities of Penn Valley, Grass Valley, and Nevada City. The success of this mine will change the character of the Brunswick basin and displace neighborhoods as we know it and in any event reduce the marketability, insurability and value of property.

Right now, Nevada County enjoys good revenues from real estate activity. The 2020-2021 budget for the county expected growth to continue from these revenues. If you put this 80 year mine in place, I think that growth will likely stop and likely reverse itself as the character of a successful mining operation takes over.

Maryanne Murphy, Esq.  
Nevada City, CA 95959  
direct (408) 921-2338

Sent with [ProtonMail](#) secure email.



## **INDIVIDUAL LETTER 562: MARYANNE MURPHY**

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### **Response to Comment Ind 562-1**

The commenter asserts that the DEIR does not address what happens to the land uses within the mineral rights zone, but does not provide specific examples that would allow for a detailed response.

Please see Master Response 7 – Location of Future Mining Areas.

### **Response to Comment Ind 562-2**

The comment does not address the adequacy of the DEIR. Please see Master Responses 5 and 6.

### **Response to Comment Ind 562-3**

The comment does not address the adequacy of the DEIR. Property values is a concern outside the scope of CEQA - please see Master Responses 1 and 2. The commenter provides no evidence to support the assertion that the project will displace neighborhoods. Currently, no residences are located on the Brunswick and Centennial Industrial Sites, so direct displacement would not result from the project. It is otherwise speculative to conclude that the project's impacts to the physical environment would indirectly displace neighborhoods.





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## **INDIVIDUAL LETTER 563: MARYANNE MURPHY**

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### **Response to Comment Ind 563-1**

This comment is similar to Comment Ind 565-1. Please see Response to Comment Ind 565-1.

### **Response to Comment Ind 563-2**

Rise Gold purchased the mineral rights from the previous owner. Property ownership issues are not considered an environmental issue under CEQA. Please see Responses to Comments Ind 565-1 and Ind 565-2.

### **Response to Comment Ind 563-3**

Land use impacts were addressed in Chapter 4.9 of the DEIR, which concluded that the project is generally consistent with the County General Plan. In addition, County staff will conduct a detailed General Plan consistency review as part of the staff report to the decisionmakers. General Plan consistency is ultimately within the purview of the Nevada County Board of Supervisors.

### **Response to Comment Ind 563-4**

Land use impacts were addressed in Chapter 4.9 of the DEIR, which concluded that the project is generally consistent with the County General Plan, including consideration of different nearby land uses and densities.

### **Response to Comment Ind 563-5**

The County provided notice to property owners and the community consistent with applicable local and state law.

### **Response to Comment Ind 563-6**

The mineral rights boundary as presented in the DEIR corresponds to the mineral rights owned by Rise, as disclosed in the deeds available for public review in the Official Records of Nevada County. Property ownership issues are not considered an environmental issue under CEQA.

### **Response to Comment Ind 563-7**

Please see Response to Comment Ind 565-2.

### **Response to Comment Ind 563-8**

In California, where mineral rights are severed from surface ownership, the mineral estate is considered the “dominant” estate and may make use of the property as reasonably incident for extraction of minerals. (*Bourdieu v. Seaboard Oil Corp. of Delaware* (1940) 38 Cal.App.2d 11, 17.) However, such use of the surface estate is subject to reasonable accommodation of surface uses. Nonetheless, property ownership issues are not considered an environmental issue under CEQA.

### **Response to Comment Ind 563-9**

Please see Response to Comment Ind 563-7.





Individual Letter 564

IDAHO-MARYLAND MINE PROJECT  
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: MARYANNE MURPHY  
Address: 13268 Woodstock Drive Nevada City, CA 95959  
Organization (if applicable): member, NEVADA County Association, Realtor

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

**Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 95959-8617  
Idaho.MMEIR@co.nevada.ca.us**

Ind 564-1

The DEIR does not address what happens to the properties within the mineral rights boundary and to the impact of quality of air, water, and land ~~as a~~ fire hazard. If the Gold explores its mineral rights instead it may generally be no divided neighborhoods. So the picture would be to examine the effects from mining work on the developed and existing commercial and residential properties which may even include the airport. Dignity, Health.

Ind 564-2

As to fire specifically, the DEIR seems to say that no very high fire risk exists in the plan. But we know that the plan includes plastic and other heavy industrial products that haven't been assessed for storage, use or risk. ~~It is a major risk.~~ For example, the Colfax fire was advancing down Highway 174 - last year I heard fire had hit the mine - what could be the potential devastation to the area from reacting dynamite with process.

*[Handwritten signature]*





## **INDIVIDUAL LETTER 564: MARYANNE MURPHY**

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### **Response to Comment Ind 564-1**

Please see Response to Comment Ind 562-1.

### **Response to Comment Ind 564-2**

Wildfire impacts are discussed in Chapter 4.13 of the DEIR, and Hazards including explosion risk is addressed in Chapter 4.7 of the DEIR. Please also see Master Response 6 – Wildfire Impacts, and Master Response 10 – Explosives, Reagents, and Brunswick Fill.



**Individual Letter 565**

**From:** maryannemurphyesq <themislaw@protonmail.com>  
**Sent:** Tuesday, March 8, 2022 10:00 AM  
**To:** Heidi Hall; BOS Public Comment; Matt Kelley  
**Subject:** RiseGold's application re: notice of and permitting process

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Dear Board, Mr. Kelly and Ms. Hall:

It is my position that the granting of a heavy industrial permit or any permit to RiseGold may have been in error under California and or US law. In addition, given the issue of surface property rights versus mineral rights as explained below, the notice of plan is insufficient on this basis alone and should have been forwarded to each land owner within the claimed mineral boundary rights of RiseGold especially in light of the fact that RiseGold seeks an 80 year permit. Sufficient notice was required to allow a landowner to take steps consistent with its rights.

I believe that the owner of the Mine may have abandoned any mineral rights and transferred nothing to RiseGold. I base this position in part on the fact that the mine has been closed since the mid 20th century and on the development of this area with anything but gold mining under the County's General plan.

A thorough legal review of the deed and filings of previous owners would be necessary at a minimum to determine if mineral rights exist.

Also, a thorough legal review of the rights of residents and businesses and other habitants as they relate to the alleged mineral boundary rights of the mine would need consideration, which of necessity would include confirmation of the mineral boundary rights by survey.

As you may know, US laws regulating mining and mineral rights typically prohibit the mineral owner from damaging or interfering with the use of any homes or other improvements on the land when extracting minerals. This is in part to protect the homeowner from development from mining activity in densely populated areas. See generally, USC 43 section 299. Has anyone also looked at California laws in this context which I think may be similar.

As a homeowner in Nevada County, I think these answers should be secured before any further granting of activity on RiseGold property can be considered or provided. The granting of activity such as this for 80 years is a serious exercise of the County's police power over the lives and assets of its residents.

Thank you for considering this email. If there is any information that you have in response to my specific issues above, I would appreciate the same.

Maryanne Murphy, Esq.  
4089212338  
Nevada city, CA

Ind 565-1



[https://www.easylawlookup.com/California-Law/Civil-Code/pg-102/easylookup.blp?data=CIVILCODE&sidfw=&site=EASY&location=78232&spon=&stype=P&sterm=+&smode=AND&sexact=ON&pgno=102&par=2219&dlevel=5#par\\_2219](https://www.easylawlookup.com/California-Law/Civil-Code/pg-102/easylookup.blp?data=CIVILCODE&sidfw=&site=EASY&location=78232&spon=&stype=P&sterm=+&smode=AND&sexact=ON&pgno=102&par=2219&dlevel=5#par_2219)

I am also aware of the following summary under mineral property rights by another lawyer.

## Regaining Lost Mineral Rights

In California, the law allows the owner of real property to recover lost mineral rights provided that the mineral right is dormant for at least 20 years. A dormant mineral right is one where no exploration, mining, drilling or other operations are present on the property. There must also be no property taxes assessed or paid on the separate mineral right and no notice of intent to keep the mineral right filed by the owner in the past 20 years.

[https://leginfo.legislature.ca.gov/faces/codes\\_displayText.xhtml?lawCode=CIV&division=2.&title=5.&part=2.&chapter=3.&article=2.#](https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=CIV&division=2.&title=5.&part=2.&chapter=3.&article=2.#)

Ind 565-2



## **INDIVIDUAL LETTER 565: MARYANNE MURPHY**

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### **Response to Comment Ind 565-1**

The commenter asserts that the mineral rights owned by Rise may have been abandoned but provides no evidence or legal citation for that assertion. Property ownership issues are not considered environmental impacts under CEQA. The commenter cites United States Code, Title 43, Section 299 for the proposition that federal law limits the proposed project's operations; however, this statute relates to a reservation of coal rights on land owned by the federal government, and mining operations on federal lands subject to unpatented mining claims. This statute is not applicable to the project, because the project sites consist of private mineral estates on privately held land, and do not involve federally owned land. Notice has been provided to the community consistent with CEQA and applicable state and local laws. The commenter's opposition to the project is noted for the decisionmaker's consideration.

### **Response to Comment Ind 565-2**

The commenter implies that the mineral rights are "dormant" under the California Dormant Mineral Right Act and are therefore invalid. However, under the California Dormant Mineral Right Act, mineral rights are only considered "dormant" when there has not been mining activity, a separate tax assessment, or a transfer of those rights in the last 20 years. (see California Civil Code Section 883.220.) The mineral rights were transferred to Rise within the last 20 years; thus, the minerals are definitionally not "dormant." Moreover, mineral rights cannot be extinguished under the California Dormant Mineral Right Act unless a court action is filed by the surface owner, such that mineral rights do not automatically extinguish. (see California Civil Code Section 883.221 through 883.270.) Finally, even where the mineral rights to a property are indeed "dormant" and an action is filed by the surface owner, California law permits the mineral rights owner to simply record a notice evidencing its intent to preserve the mineral right, which results in dismissal of the case. (see California Civil Code Section 883.250.) In this case, Rise's mineral rights are not dormant and Rise intends to preserve its mineral rights.



**Individual Letter 566**

From: maryanne@att.net  
To: RiseGold, ISS Board, Committee, Matt Keller  
Subject: RiseGold's application re: notice of act permitting process  
Date: Tuesday, March 8, 2022 10:43:18 AM

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**Ind 566-1**

Dear Board, Mr. Kelly and Ms. Hall:

It is my position that the granting of a heavy industrial permit or any permit to RiseGold may have been in error under California and/or US law. In addition, given the issue of surface property rights versus mineral rights as explained below, the notice of plan is insufficient on this basis alone and should have been forwarded to each land owner within the claimed mineral boundary rights of RiseGold especially in light of the fact that RiseGold seeks an 80 year permit. Sufficient notice was required to allow a landowner to take steps consistent with its rights.

I believe that the owner of the Mine may have abandoned any mineral rights and transferred nothing to RiseGold. I base this position in part on the fact that the mine has been closed since the mid 20th century and on the development of this area with anything but gold mining under the County's General plan.

A thorough legal review of the deed and filings of previous owners would be necessary at a minimum to determine if mineral rights exist.

Also, a thorough legal review of the rights of residents and businesses and other habitats as they relate to the alleged mineral boundary rights of the mine would need consideration, which of necessity would include confirmation of the mineral boundary rights by survey.

As you may know, US laws regulating mining and mineral rights regulating mining and mineral rights typically prohibit the mineral owner from damaging or interfering with the use of any homes or other improvements on the land when extracting minerals. This is in part to protect the homeowner from development from mining activity in densely populated areas. See generally, USC 43 section 299. Has anyone also looked at California laws in this context which I think may be similar.

As a homeowner in Nevada County, I think these answers should be secured before any further granting of activity on RiseGold property can be considered or provided. The granting of activity such as this for 80 years is a serious exercise of the County's police power over the lives and assets of its residents.

Thank you for considering this email. If there is any information that you have in response to my specific issues above, I would appreciate the same.

Maryanne Murphy, Esq.  
4089212338  
Nevada city, CA

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**Ind 566-2**

I am also aware of the following summary under mineral property rights by another lawyer.

**Regaining Lost Mineral Rights**

In California, the law allows the owner of real property to recover lost mineral rights provided that the mineral right is dormant for at least 20 years. A dormant mineral right is one where no exploration, mining, drilling or other operations are present on the property. There must also be no property taxes assessed or paid on the separate mineral right and no notice of intent to keep the mineral right filed by the owner in the past 20 years.

[https://leginfo.ca.gov/faces/codes\\_displayText.xhtml?lawCode=CIV&division=2.&title=5.&part=2.&chapter=3.&article=2.#](https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=CIV&division=2.&title=5.&part=2.&chapter=3.&article=2.#)





**INDIVIDUAL LETTER 566: MARYANNE MURPHY**

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**Response to Comment Ind 566-1**

Please see Response to Comment Ind 565-1.

**Response to Comment Ind 566-2**

Please see Response to Comment Ind 565-2.



Individual Letter 567

3/18/22, 11:10 AM

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DIVISION 2. PROPERTY [654 - 1422] (*Heading of Division 2 amended by Stats. 1988, Ch. 160, Sec. 13.*)

PART 2. REAL OR IMMOVABLE PROPERTY [[755.] - 945.5] (*Part 2 enacted 1872.*)

TITLE 5. MARKETABLE RECORD TITLE [880.020 - 887.090] (*Title 5 added by Stats. 1982, Ch. 1268, Sec. 1.*)

CHAPTER 3. Mineral Rights [883.110 - 883.270] (*Chapter 3 added by Stats. 1984, Ch. 240, Sec. 2.*)

ARTICLE 2. Termination of Dormant Mineral Right [883.210 - 883.270] (*Article 2 added by Stats. 1984, Ch. 240, Sec. 2.*)

**883.210.** The owner of real property subject to a mineral right may bring an action to terminate the mineral right pursuant to this article if the mineral right is dormant.  
(*Added by Stats. 1984, Ch. 240, Sec. 2.*)

**883.220.** For the purpose of this article, a mineral right is dormant if all of the following conditions are satisfied for a period of 20 years immediately preceding commencement of the action to terminate the mineral right:

(a) There is no production of the minerals and no exploration, drilling, mining, development, or other operations that affect the minerals, whether on or below the surface of the real property or on other property, whether or not unitized or pooled with the real property.

(b) No separate property tax assessment is made of the mineral right or, if made, no taxes are paid on the assessment.

(c) No instrument creating, reserving, transferring, or otherwise evidencing the mineral right is recorded.  
(*Added by Stats. 1984, Ch. 240, Sec. 2.*)

**883.230.** (a) An owner of a mineral right may at any time record a notice of intent to preserve the mineral right.

(b) In lieu of the statement of the character of the interest claimed and the record location of the documents creating or evidencing the mineral rights claimed as otherwise required by paragraph (2) of subdivision (b) of Section 880.330 and in lieu of the legal description of the real property in which the interest is claimed as otherwise required by paragraph (3) of subdivision (b) of Section 880.330 and notwithstanding the provisions of Section 880.340 or any other provision in this title, a notice of intent to preserve a mineral right may refer generally and without specificity to any or all mineral rights claimed by claimant in any real property situated in the county.

(c) A mineral right is not dormant for the purpose of this article if:

(1) A notice of intent to preserve the mineral right is recorded within 20 years immediately preceding commencement of the action to terminate the mineral right.

(2) A notice of intent to preserve the mineral right is recorded pursuant to Section 883.250 after commencement of the action to terminate the mineral right.

(*Added by Stats. 1984, Ch. 240, Sec. 2.*)

**883.240.** (a) An action to terminate a mineral right pursuant to this article shall be brought in the superior court of the county in which the real property subject to the mineral right is located.

(b) The action shall be brought in the same manner and shall be subject to the same procedure as an action to quiet title pursuant to Chapter 4 (commencing with Section 760.010) of Title 10 of Part 2 of the Code of Civil Procedure, to the extent applicable.

(*Added by Stats. 1984, Ch. 240, Sec. 2.*)

Ind 567-1

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1/2



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**883.250.** In an action to terminate a mineral right pursuant to this article, the court shall permit the owner of the mineral right to record a late notice of intent to preserve the mineral right as a condition of dismissal of the action, upon payment into court for the benefit of the owner of the real property the litigation expenses attributable to the mineral right or portion thereof as to which the notice is recorded. As used in this section, the term "litigation expenses" means recoverable costs and expenses reasonably and necessarily incurred in preparation for the action, including a reasonable attorney's fee.

*(Added by Stats. 1984, Ch. 240, Sec. 2.)*

**883.260.** A mineral right terminated pursuant to this article is unenforceable and is deemed to have expired. A court order terminating a mineral right pursuant to this article is equivalent for all purposes to a conveyance of the mineral right to the owner of the real property.

*(Added by Stats. 1984, Ch. 240, Sec. 2.)*

**883.270.** Subject to Section 880.370 (grace period for recording notice), this article applies to all mineral rights, whether executed or recorded before, on, or after January 1, 1985.

*(Added by Stats. 1984, Ch. 240, Sec. 2.)*



## **INDIVIDUAL LETTER 567: MARYANNE MURPHY**

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### **Response to Comment Ind 567-1**

The comment is an attachment related to Individual Letter 566. Please see comments and responses to Individual Letter 566.



Individual Letter 568

3/18/22, 11:10 AM

California Law - Civil Code - (pg. 102) Chapter 3. Mineral Rights

# Easy Law Lookup

California Laws - Civil Code (pg. 102)  
Chapter 3. Mineral Rights

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## California Laws | Civil Code EFFECT OF THE 1872 CODES (23-23.6) DIVISION 2. PROPERTY

pg. 102

**882.050.** Expiration of the lien of a mortgage, deed of trust, or other security interest pursuant to this chapter or any other statute renders the lien unenforceable by any means commenced or asserted thereafter and is equivalent for all purposes to a certificate of satisfaction, reconveyance, release, or other discharge of the security interest, and execution and recording of a certificate of satisfaction, reconveyance, release, or other discharge is not necessary to terminate or evidence the termination of the security interest. Nothing in this section precludes execution and recording at any time of a certificate of satisfaction, reconveyance, release, or other discharge. <sup>(2215)</sup>

**882.040. (a)** Subject to Section 880.370 (grace period for recording notice) and except as otherwise provided in this section, this chapter applies on the operative date to all mortgages, deeds of trust, and other instruments that create a security interest in real property to secure a debt or other obligation, whether executed or recorded before, on, or after the operative date. <sup>(2216)</sup>

**(b)** This chapter shall not cause the lien of a mortgage, deed of trust, or other security interest in real property to expire or become unenforceable before the passage of five years after the operative date of this chapter. <sup>(2217)</sup>

### CHAPTER 3. MINERAL RIGHTS <sup>(2218)</sup> (Text)

#### Article 1. General Provisions (883.110-883.140) <sup>(2219)</sup> (Text)

**883.110.** As used in this chapter, "mineral right" means an interest in minerals, regardless of character, whether fugacious or nonfugacious, organic or inorganic, that is created by grant or reservation, regardless of form, whether a fee or lesser interest, mineral, royalty, or leasehold, absolute or fractional, corporeal or incorporeal, and includes express or implied appurtenant surface rights. <sup>(2220)</sup>

**883.120. (a)** This chapter does not apply to a mineral right reserved to the United States (whether in a patent, pursuant to federal law, or otherwise) or to an oil or gas lease, mining claim, or other mineral right of a person entitled pursuant thereto, to the extent provided in Section 880.240. <sup>(2221)</sup>

**(b)** This chapter does not apply to a mineral right of the state or a local public entity, or of any other person, to the extent provided in Section 880.240. <sup>(2222)</sup>

**883.130.** Nothing in this chapter limits or affects the common law governing abandonment of a mineral right or any other procedure provided by statute for clearing an abandoned mineral right from title to real property. <sup>(2223)</sup>

**883.140. (a)** As used in this section: <sup>(2224)</sup>

(1) "Lessee" includes an assignee or other successor in interest of the lessee. <sup>(2225)</sup>

(2) "Lessor" includes a successor in interest or heir or grantee of the lessor. <sup>(2226)</sup>

**(b)** If the term of a mineral right lease has expired or a mineral right lease has been abandoned by the lessee, the lessee shall, within 30 days after demand therefor by the lessor, execute, acknowledge, and deliver, or cause to be recorded, a deed quitclaiming all interest in and to the mineral rights covered by the lease. If the expiration or abandonment covers less than the entire interest of the lessee, the lessee shall execute, acknowledge, and deliver an appropriate instrument or notice of surrender or termination that covers the interest that has expired or been abandoned. <sup>(2227)</sup>

**(c)** If the lessee fails to comply with the requirements of this section, the lessee is liable for all damages sustained by the lessor as a result of the failure, including, but not limited to, court costs and reasonable attorney's fees in an action to clear title to the lessor's interest. The lessee shall also forfeit to the lessor the sum of one hundred fifty dollars (\$150). <sup>(2228)</sup>

**(d)** Nothing in this section makes a quitclaim deed or other instrument or notice of surrender or termination, or a demand therefor, a condition precedent to an action to clear title to the lessor's interest. <sup>(2229)</sup>

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#### Ignorance is No Excuse Your Right To Know The Law

All citizens have a right to have access to the laws that govern them. Citizen awareness and participation in government is fundamental to ensuring a sound democracy.

Although unfettered access to the law is a fundamental right to all citizens, there is no substitute for experienced legal counsel.

We do not recommend self-representation. We do, however, recognize that in an age where people routinely research legal matters online using everything from a smartphone to their xbox, both attorneys and clients alike can benefit from this resource.

Ind 568-1

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3/18/22, 11:10 AM

California Law - Civil Code - (pg. 102) Chapter 3. Mineral Rights

**Article 2. Termination of Dormant Mineral Right (883.210-883.270) (2230) (Text)**

883.210. The owner of real property subject to a mineral right may bring an action to terminate the mineral right pursuant to this article if the mineral right is dormant. (2231)

883.220. For the purpose of this article, a mineral right is dormant if all of the following conditions are satisfied for a period of 20 years immediately preceding commencement of the action to terminate the mineral right: (2232)

- (a) There is no production of the minerals and no exploration, drilling, mining, development, or other operations that affect the minerals, whether on or below the surface of the real property or on other property, whether or not unitized or pooled with the real property. (2233)
- (b) No separate property tax assessment is made of the mineral right or, if made, no taxes are paid on the assessment. (2234)
- (c) No instrument creating, reserving, transferring, or otherwise evidencing the mineral right is recorded. (2235)

883.230. (a) An owner of a mineral right may at any time record a notice of intent to preserve the mineral right. (2236)

- (b) In lieu of the statement of the character of the interest claimed and the record location of the documents creating or evidencing the mineral rights claimed as otherwise required by paragraph (2) of subdivision (b) of Section 880.330 and in lieu of the legal description of the real property in which the interest is claimed as otherwise required by paragraph (3) of subdivision (b) of Section 880.330 and notwithstanding the provisions of Section 880.340 or any other provision in this title, a notice of intent to preserve a mineral right may refer generally and without specificity to any or all mineral rights claimed by claimant in any real property situated in the county. (2237)
- (c) A mineral right is not dormant for the purpose of this article if: (2238)
  - (1) A notice of intent to preserve the mineral right is recorded within 20 years immediately preceding commencement of the action to terminate the mineral right. (2239)
  - (2) A notice of intent to preserve the mineral right is recorded pursuant to Section 883.250 after commencement of the action to terminate the mineral right. (2240)



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## **INDIVIDUAL LETTER 568: MARYANNE MURPHY**

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### **Response to Comment Ind 568-1**

The comment is an attachment related to Individual Letter 566. Please see comments and responses to Individual Letter 566.



**Individual Letter 569**

**From:** [maryannemurphyesq](#)  
**To:** [BOC Public Comment](#)  
**Cc:** [Heidi Hall](#); [Matt Kelley](#)  
**Subject:** RiseGolds claim of making \$122,000 per year.  
**Date:** Tuesday, March 1, 2022 11:37:58 AM

Dist 1

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Recently, RiseGold sent out a mailing to the community claiming wages in the amount of \$ 122,000 per year as Miner among other things.

We don't know who would make those wages and when.

The wage position it took is inflated. The information below is consistent with that of the Department of Labor Statistics.

Also, If you were to research " mining jobs" in Nevada where mining is in full force by Neumont and others you would find 400 jobs available for the entire State in mining in general.

So I don't know when or what jobs it is talking about creating thru Rise Gold and for how long as it is an exploratory company only. It's stated number of jobs available also appears to be inflated.

Anyway, here is the wage report that I mentioned. Located at [comparably.com](#). Also check out information at [bls.gov](#).

**Ind 569-1**

#### Salary Ranges for Gold Miners

The salaries of Gold Miners in the US range from \$30,880 to \$70,360 , with a median salary of \$48,550 . The middle 60% of Gold Miners makes \$48,550, with the top 80% making \$70,360.

#### How much tax will you have to pay as a Gold Miner

For an individual filer in this tax bracket, you would have an estimated average federal tax in 2018 of 22%. After a federal tax rate of 22% has been taken out, Gold Miners could expect to have a take-home pay of \$42,547/year, with each paycheck equaling approximately \$1,773\*.

\* assuming bi-monthly pay period. Taxes estimated using tax rates for a single filer using 2018 federal and state tax tables. Metro-specific taxes are not considered in calculations. This data is intended to be an estimate, not prescriptive financial or tax advice.



**Quality of Life for Gold Miner**

With a take-home pay of roughly \$3,546/month, and the median 2BR apartment rental price of \$2,506/mo\*\*, a Gold Miner would pay 70.68% of their monthly take-home salary towards rent.

\*\* This rental cost was derived according to an online report at [Apartment List](#)

\*\*\* Average cost of living was acquired from [Numbeo's Cost of Living Index](#)

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## **INDIVIDUAL LETTER 569: MARYANNE MURPHY**

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### **Response to Comment Ind 569-1**

This comment is in regard to wages and economic issues which are not required under CEQA to be analyzed in the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.





**Individual Letter 570**

**From:** [Shannon Cotter](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** Mine Comments  
**Date:** Thursday, February 24, 2022 3:58:08 PM

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Dear Mr. Kelly,

I'll keep this brief as I'm sure you are inundated with comments on the matter.

As a Grass Valley resident, living along Wolf Creek at 415 Mill Street, I have seen firsthand the rise and fall of the creek on our property. Additionally, our property has a drainage pipe that empties into Wolf Creek, or in the case of flooding, back floods our property. I understand that Wolf Creek is the proposed discharge route for the water that will be expelled from the mine. I'm concerned for our own property and that of our lower-lying Mill Street neighbors even more prone to flooding. But perhaps more concerning is the proposed drain on one of our most precious resources; water. I don't understand how this project can even be considered given our historic drought situation. Perhaps I have been misinformed, but the amount of water I hear will be used and discharged through Wolf Creek is astounding. Local residents, state residents, and even nationally, are being asked to conserve water due the drought, yet the mine will be using all that water?

Thank you for your time and consideration.

Matt & Shannon Cotter  
(530)798-1192

**Ind 570-1**



## **INDIVIDUAL LETTER 570: MATT AND SHANNON COTTER**

---

### **Response to Comment Ind 570-1**

Please see Master Response 35 – Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Regarding groundwater and drought concerns please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



Dist 3

Ind 571-1

**I support re-opening the Idaho-Maryland Mine. Individual Letter 571**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$22,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) MAT GOTTSCHALK  
Address 12645 Labarr Meadows Rd. GN ZIP 95949  
Phone 530-263-3107  
Email Address matthew.gottschalk@yahoo.com

**NO MINE!**

**RECEIVED**  
MAY 13 2022  
NEVADA COUNTY  
BOARD OF SUPERVISORS



## **INDIVIDUAL LETTER 571: MATT GOTTSCHALK**

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### **Response to Comment Ind 571-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1.



Individual Letter 572



COUNTY OF NEVADA  
COMMUNITY DEVELOPMENT AGENCY  
950 MAIDU AVENUE, SUITE 170, NEVADA CITY, CA 95959-8617  
(530) 265-1222 mynevadacounty.com

CDA Transmittal Letter

Drop off for (choose one department):

- Planning
- Environmental Health
- Public Works
- Agricultural Commissioner
- Code Compliance
- Cannabis Compliance WATER

Nevada County CDA  
JAN 27 2022  
Environmental Health

Date: JAN 25<sup>th</sup> 2022

Contact name: MATTHEW COULTER

Permit number (if applicable): ? IDAHO MARYLAND MINE

Contact phone number (required): 530-277-2214

Contact email (required): NONE - 33% of Nev. Co. has NO INTERNET.

Description of documents and notes for department: SCH # 2020070378

THE 60 DAY COMMENT PERIOD IS HALF OVER. IT WAS STARTED DURING A 18 DAY POWER OUTAGE, A STATE OF EMERGENCY, AND CLOSED LIBRARIES, THAT ONLY GOT SOME OF THE REQUIRED PUBLICLY AVAILABLE INFO AFTER THE COMMENT PERIOD STARTED. I REQUEST THE 60 DAY COMMENT PERIOD IS STARTED OVER.

Ind 572-1





## **INDIVIDUAL LETTER 572: MATTHEW COULTER**

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### **Response to Comment Ind 572-1**

The DEIR was released for public review on January 4, 2022 for a 60-day public review period, which was extended to April 4, 2022 for a total public review period of 91 days.



Individual Letter 573

From: Maureen Cuthbert  
To: Matt Kelley  
Date: 4/1/2022  
Subject: Rise mine



Dear Mr. Kelley,

Ind 573-1

I do not support the Rise mine and don't agree that it is good for Nevada County.

Rise Gold is a Canadian company with a questionable track record. Profits will end up in Canada with Nevada County taking an environmental hit.

Ind 573-2

Toxic waste generated by mine operations put residential communities at risk.

Ind 573-3

Air pollution due to dust from processing exacerbates existing Nevada County issues with air quality.

Ind 573-4

Energy consumption will stress an already strained power grid.

Ind 573-5

And finally, most importantly, water usage required for their mining operations is completely irresponsible for consideration. Many wells are already going



dry in our communities. We do not have adequate water reserves to support existing residential and business communities. To allow massive and wasteful water usage to line the pockets of a Canadian company during severe drought conditions is just frivolous and reckless.

Please do what you can do to stop the Rise Idaho-Maryland mine.

Signed: Maureen Cuthbert  
PO Box 549  
19702 Mockingbird Way  
Grass Valley, Ca 95712





Ind 573-6

**I support re-opening the Idaho-Maryland Mine.**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Maureen Cuthbert  
Address PO Box 549 Chicago Park ZIP 95712  
Phone 530-557-5365  
Email Address maureencuthbert69@msn.com





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## **INDIVIDUAL LETTER 573: MAUREEN CUTHBERT**

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### **Response to Comment Ind 573-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 573-2**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns related to toxic waste; without further specificity a detailed response is not possible. Hazards and hazardous materials associated with the project are addressed in Chapter 4.7, Hazards and Hazardous Materials, of the DEIR.

### **Response to Comment Ind 573-3**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns related to air pollution, specifically dust. Without further specificity a detailed response is not possible. Fugitive dust is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

### **Response to Comment Ind 573-4**

The comment does not specifically address the adequacy of the DEIR, but rather provides general energy-related concerns. Energy is addressed in Chapter 4.3 of the DEIR.

### **Response to Comment Ind 573-5**

Regarding water concerns, please see Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 573-6**

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 574**

Nevada County Planning Dept  
Matt Kelley Senior Planner  
Feb 5,2022

CC: Board of Supervisors:  
Heidi Hall (Dist 1)  
Ed Scofield (Dist 2)  
Dan Miller (Dist 3)  
Susan Hoek (Dist 4)  
Richard Anderson (Dist 5)

CC: Cea NC. Org

To Whom it may concern:

We Oppose the RE-OPENING of the IDAHO MARYLAND MINE.

We have been residents of Grass Valley, living off Greenhorn Rd for the past 40 years. We vehemently oppose the proposal to open the Idaho Maryland Mine, that is being spearheaded by Ben Mossman of Rise Gold Co.

**Ind 574-1**

We believe that the re-opening of this mine, if granted would have devastating and catastrophic effects on this community.

The environmental affects it would have on our water, atmosphere and wildlife, through the emissions of chemicals in the mining process, would result in the contamination of ground water, surface water and soil. The atmosphere will have significant detrimental effects on humans, animals and vegetation.

**Ind 574-2**

Should the mine be allowed to re open the endangered species cohabitating in this area, in particular, the yellow leg frog and the pacific ficher will become extinct .

**Ind 574-3**

Statistically mining kills and injures more workers than any industry, nearly 15,000 per year.

**Ind 574-4**

There are estimations of 47,000 abandon mines spread throughout every county in California, leaving the land decimated, contaminated, and abandoned.



Ind 574-5

Mining is currently responsible for 4-7% of Green house gases.  
Consider the impact of radioactive gases, such as the radon that is emitted from the sludge in a tailing pond.

Other concerns , would be the possibility of sink holes and earthquakes.

Ind 574-6

“Mining accounts for the high number of human induced earthquakes worldwide. The removal of the earth can cause instability, leading to sudden collapses that trigger earthquakes”.National Geographic 2017.

Furthermore , tectonic earthquakes can also collapse mine openings and tunnels with weak infrastructure.

Ind 574-7

Mining would impact and lower the water table causing the overlying rock and soil to collapse.

As is well known, sink holes are appearing more frequently each winter in Nevada County. Brunswick Rd, adjacent to the mine site, had a massive sink hole several years ago. There have been several others as well.

How is it that , Mr. Ben Mossman, CEO of Rise Gold Co. was able to acquire permits to potentially re-open this mining project, with NO investigation of his previous business history?

Records show that he abandoned the Hechate Strait Mining project on Bank Island in Canada and then filed Bankruptcy .  
He has many violations and fines according to the Canadlan Fisheries Environmental Management and Water Acts.

Ind 574-8

The investigation of that project shows again ,that he violated the environmental management act by dumping mine debris in the woods at the site. He was also sited for failure to report spills that affected the safety of fish and food.

Consequently , Ben Mossman is facing charges for damages caused. Mr Mossman has already shown his disdain and disregard for this community by not complying with the Timber Harvest Plans rules and regulations.  
Mr Mossman also ignored riparian set back requirements for streams in Nevada County at his East Bennett project site.



Ind 574-9

Property values in the vicinity of East Bennett, Brunswick, Idaho Maryland and Greenhorn will decrease drastically.  
If we should have a fire disaster such as the devastating fire that happened in Paradise Ca, a sufficient water supply will not be available .

Ind 574-10

DRAINS OUR WATER. "Water is one of the most precious resources we have, but Rise Gold plans pump out 3.6 million everyday for 6 months and another 1.2 for up to 80 years - flooding creeks, destroying habit, and putting 300 plus private wells at risk." CEAF

Ind 574-11

Traffic congestion , noise pollution and damage to roads (that will be continuous for 24 hours a day, 7 days a week, for a projected 80 years). Are crucial issues as well.

Ind 574-12

This proposal with all the toxic chemicals involved, the explosive materials being trucked shipped and stored, is simply an accident waiting to happen.

Rise Gold estimates 70 jobs will be provided for local residents.

The Gold profits leave this community , but the decimated quality of life will remain.

This community will gain nothing in return for the environmental destruction it will be left with.

Ind 574-13

This horrendous plan of reopening this mine with all the detrimental damage it will cause is Unthinkable and Unacceptable .

Please STOP the CARNAGE that the proposed re-opening of this mine will bring to this community.

Thank you for your attention to this very important matter.

▼ Deborah Shriver



Maureen Miranda  
Email: [mozophoto1@yahoo.com](mailto:mozophoto1@yahoo.com)





## **INDIVIDUAL LETTER 574: MAUREEN MIRANDA**

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### **Response to Comment Ind 574-1**

The commenter believes the project would have adverse impacts to the community. The commenter lists a variety of environmental concerns but does not provide any specific comments. The commenter's opposition to the project is noted for the decisionmakers. Please see Master Response 1 – Non-EIR/Administrative Issues.

### **Response to Comment Ind 574-2**

The commenter asserts that project implementation would result in endangered species in the project area becoming extinct, including the foothill yellow-legged frog and the pacific fisher. Potential impacts to special status plant and wildlife species are evaluated in DEIR Chapter 4.4 (Biological Resources) and are each mitigated to a less than significant level. With regard to foothill yellow-legged frog, the commenter is referred to Master Response 38 - Foothill Yellow-Legged Frog and California Red-Legged Frog. The pacific fisher does not inhabit the project area.

### **Response to Comment Ind 574-3**

The commenter states that mining accidents cause 15,000 injuries or deaths per year. The comment is noted for the decisionmakers but does not address a specific environmental concern or the adequacy of the DEIR.

### **Response to Comment Ind 574-4**

The commenter states that California has approximately 47,000 abandoned mines, leaving land decimated and contaminated. The comment is noted for the decisionmakers but does not address a specific environmental concern or the adequacy of the DEIR.

### **Response to Comment Ind 574-5**

The commenter states that the project will emit radioactive gases, such as radon, from the sludge in a tailings pond. The project does not include a tailings pond. The project's potential to emit greenhouse gas emissions is addressed in DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). The impacts were found to be less than significant after mitigation.

### **Response to Comment Ind 574-6**

The commenter states that the project would result in ground collapse or sinkholes. Ground collapse is discussed in Chapter 4.6 (Geology, Soils and Mineral Resources) beginning on DEIR page 4.6-44. As described in this section, "sink holes" occur within limestone environments and are caused by the dissolution of the stone itself creating a cave just below the ground surface. This type of ground collapse would not be expected in the project area which is granitic. Instead, mine-related collapse in the project area could occur where a vein outcrops on the surface and around mineshafts and other near surface mining features. A Geotechnical Assessment of Near Surface Mine Features conducted for the project recommended closure of several near surface features prior to development. Mitigation Measure 4.6-3(c) requires closure of these features under the direction of licensed geotechnical engineer and would reduce the potential for collapse to a less than significant level. The commenter is also referred to Master Response 29 - Near Surface Workings.

### **Response to Comment Ind 574-7**

Please see Response to Comment Ind 574-6.



### **Response to Comment Ind 574-8**

This comment concerns the reputation and prior mining projects of the Project Applicant. The comment is noted for the decisionmakers but does not address a specific environmental concern or the adequacy of the DEIR. The commenter is referred to Master Response 3 – Operator Responsibility.

### **Response to Comment Ind 574-9**

The commenter states that the project would have adverse impacts on property values. CEQA does not require the EIR to consider economic impacts such as decreased property values. The commenter is referred to Master Response 2 - Social and Economic Impacts.

The commenter states that a sufficient water supply will not be available to fight a devastating fire if the project is implemented. The commenter provides no substantial evidence that the project will result in a lack of sufficient water supply for firefighting purposes. Water used for firefighting in the project area would be provided by Nevada Irrigation District which obtains its water supply from surface waters. The commenter is further referred to Master Response 6 - Wildfire Impacts.

### **Response to Comment Ind 574-10**

The commenter states that dewatering the mine would have a number of adverse impacts to the community. Project impacts related to drainage and potential flooding are addressed under Impact 4.8-3, beginning on DEIR page 4.8-69. Project impacts on wildlife habitat are addressed under Impact 4.4-2, beginning on DEIR page 4.4-68. Project impacts on groundwater levels and recharge are addressed under Impact 4.8-2, beginning on DEIR page 54. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 36 – Flows in South Fork Wolf Creek.

### **Response to Comment Ind 574-11**

The commenter states that the project will result in traffic and noise pollution but does not state how the DEIR is inadequate. Project impacts related to traffic congestion and noise pollution are addressed in DEIR Chapter 4.12 (Transportation) and Chapter 4.10 (Noise and Vibration), respectively. Mitigation Measure 4.12-6(a) requires the project's construction phase traffic control plan to include monitoring for roadbed damage and specify timing for completing needed repairs. Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

### **Response to Comment Ind 574-12**

The commenter states that the project is an accident waiting to happen because of the project's use of "explosive materials" and "toxic chemicals", but the commenter does not state why the DEIR is inadequate with regard to analyzing potential hazards. Further, the commenter's reference to "toxic chemicals" is unclear. For example, it is noted on page 3-25 of Chapter 3 that mercury or cyanide would not be used in gold mineral processing. Potential hazards associated with the use, transport, and storage of hazardous materials and explosives during project operation are addressed in detail in Chapter 4.7 (Hazards and Hazardous Materials).



**Response to Comment Ind 574-13**

The commenter states that the project's adverse impacts outweigh its benefits. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Comment 2 - Social and Economic Impacts.



**Individual Letter 575**

**From:** Megan Hart <meganelaynehart@gmail.com>  
**Sent:** Monday, April 4, 2022 10:49 AM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** I Stand in Opposition to the Mine

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To whom it may concern,

My name is Megan Hart. I have lived in Nevada County for 20 years. This place has formed me as a person and I am better for it. I oppose this mine in every way. Living, for most of my years here, out near the Malakoff Diggins, dealing with water table issues and other environmental problems, it is astounding to me that in 2022, we have not learned from our mistakes. To even entertain the idea again is absurd. The money is not worth the long term effects this shortsighted and neglectful premise. Absolutely no mining. Period.

Megan Hart  
Hart House Wine Company  
@harthousewinecompany  
530-559-1380

**Ind 575-1**



## **INDIVIDUAL LETTER 575: MEGAN HART**

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### **Response to Comment Ind 575-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 576**

**From:** [Mama Melanie](#)  
**To:** [hcbosupervisors](#)  
**Subject:** Public comment  
**Date:** Wednesday, January 19, 2022 9:30:32 AM

**Unable to identify**

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Board of Supervisors Across All Districts,

My name is Melanie Bright and it is irrelevant which district I'm in as everyone would be equally effected by the opening of the mine. There are no borders between districts where the terrible dust, noise and other pollutions would magically stop and disappear. We're all equally at risk.

People who have chosen to live in this area do so because it's healthier to live out here versus a city. We come for the clean air and quiet ambiance.

The company seeking to open the mine has a history of financial failure and a history of not putting communities first. This company has a pocketbook in mind, not the welfare of others. It has already been proven. So what will you chose? Fatten the pocketbook of the mining company and risk all of our resources in doing so? — or protect our resources and the people?

Lastly, you may think this is a good idea, but what if you're wrong? What if you have doomed an entire county to horrific air quality, water loss and pollution, noise pollution, and more? Would you be able to sleep at night knowing you caused tens of thousands of people to develop serious health issues? Could you live with yourself knowing people died because of the air pollution you agreed to? For example, my son is eight years old and had two open heart surgeries at birth. Air pollution could literally cut his life span down. We moved here in order to HELP him and give him the longest chance at life. Could you vote yes knowing there are hundreds or thousands of other people at risk already? Is the mine opening more important than human life?

Could you look into the faces of the families of those who lost someone to lung cancer? Are you okay for everyone to lose value on their homes? Are you okay knowing your choice to agree drove people out of Nevada County?

If you agree to open the mine, you have not voted for the wellbeing of those who elected you to protect them. You will have failed the people for your own gain— whatever that may be. Maybe you want to look productive or maybe your ego likes to see others beg for you to spare us. Not all gain is financial.

You have seen the evidence of how destructive this choice would be and you cannot unsee it.

Thank you,  
A concerned citizen

Sent from my iPhone

**Ind 576-1**



## **INDIVIDUAL LETTER 576: MELANIE BRIGHT**

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### **Response to Comment Ind 576-1**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. For the generally referenced concerns regarding air pollution, water loss, noise, and traffic, please see the analyses of these topics in Chapter 4.3, Air Quality, Greenhouse Gas Emissions and Energy; Chapter 4.8, Hydrology and Water Quality; Chapter 4.10, Noise and Vibration, and Chapter 4.12, Transportation. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 577**

**From:** Menkin Nelson <menkin@highpocketsllc.com>  
**Sent:** Monday, April 4, 2022 4:45 PM  
**To:** Idaho MMEIR; Matt Kelley  
**Subject:** Letter Regarding the Idaho Maryland Mine DEIR  
**Attachments:** MineDEIR\_Letter.pdf

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Hey Matt and the Planning Commission,

Attached is my written response to the DEIR for the Idaho Maryland Mine Project. Like almost everyone I've encountered in the County I am opposed to the re-opening of such an enormous industrial project with unknown consequences.

Although not a part of my official statement (attached) I was privy to the Bear Yuba Land Trust making an offer to Rise Gold to purchase the Brunswick Site property listed in the Proposal. That alternative is the kind of development our County should encourage, our residents desire and our real estate agents would do backflips for :)

Thank you all in advance for considering my statements, the time and energy you are putting into reviewing and understanding our concerns.

Sincerely,

Menkin Nelson  
(530) 955 -3129



**Ind 577-1**



April 4, 2022

To: Attn: Matt Kelley  
Nevada County Planning Commission

Regarding: PLN19-0176; CUP19-0014; RZN19-0002; MGT19-0039; MGT19-0040;  
VAR19-0003; EIR19-0001; MGT20-0009; MGT20-0010; MGT20-0011;  
MGT20-0012; MGT20-0013; LLA20-0006; AAM21-00002  
Proposal to Re-Open the Idaho Maryland Mine Underground Mining and  
the Associated Draft Environmental Impact Review SCH# 2020070378

Prepared By: Menkin Nelson

Ind 577-2

Proposed Project Description:

The proposed project's surface components would be located on approximately 175.64 acres consisting of the Brunswick Industrial Site, the Centennial Industrial Site, and a 0.30-acre portion of East Bennett Road for off-site improvements associated with a potable water pipeline easement. The project would also involve underground mining within an approximately 2,585-acre mineral rights boundary owned by the applicant. The potable water pipeline easement would be located along East Bennett Road, and would be contained within the existing right-of-way. Both the Brunswick Industrial Site and the Centennial Industrial Site are located within unincorporated western Nevada County and are owned by Rise Grass Valley. The approximately 119-acre Brunswick Industrial Site is located southwest of the intersection of East Bennett and Brunswick Roads, and is comprised of Assessor's Parcel Numbers (APNs): 006-441-003 (12503 Brunswick Road), 006-441-004 (12625 Brunswick Road), 006-441-005 (12791 Brunswick Road), 006-441-034 (12381 Brunswick Road), 009-630-037 (12369 East Bennett Road), and 009-630-039 (12301 Millsite Road). The approximately 56.41-acre Centennial Industrial Site is located southwest of the intersection of Idaho Maryland Road and Centennial Drive and is comprised of APNs: 009-550-032, 009-550-037 (10344 Centennial Drive), 009-550-038 (10350 Centennial Drive), 009-550-039 (10344 Centennial Drive), 009-550-040, and 009-560-036 (10350 Centennial Drive).

The much larger mineral rights boundary encompasses approximately 2,585 acres and generally contains properties surrounding the Brunswick and Centennial Industrial Sites, with the majority of additional land area located north of the Brunswick Industrial Site and east of the Centennial Industrial Site. This generally includes most of the Nevada County Airport and surrounding Air Park, as well as property along both sides of Brunswick Road, Greenhorn Road, and Idaho Maryland Road.

The proposed project would reinitiate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year permit period with gold





mineralization processing and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations. Following completion of mining and processing activities, the project sites would be reclaimed to open space and land suitable for future development of industrial uses. Generally, the proposed project would include the following components:

- Dewatering the existing underground mine workings;
- Underground mining at a depth of 500 feet or more in areas underlying the mineral rights properties;
- Construction and operation of aboveground processing and water treatment facilities at the Brunswick Industrial Site;
- Engineered fill placement for potential future industrial pad development at the Centennial and the Brunswick Industrial Sites;
- Installation of a potable water pipeline for residential potable water supply; and
- Reclamation of the project sites in accordance with a proposed Reclamation Plan.

The majority of the aboveground facilities, access to the underground mining, and a portion of the engineered fill would be located on the Brunswick Industrial Site. The aboveground facilities would be located within a 29-acre industrial area that would include but not be limited to, a headframe building around the existing concrete silo used to hoist rock from the Brunswick shaft; covered conveyor system used to transport a) barren rock to a truck hauling area within an adjacent enclosed building, and b) gold concentrate to the processing plant; a processing plant to grind rock and recover gold minerals through various processes; and other appurtenant structures such as office and warehouse space. An above-ground water treatment plant would also be built at the Brunswick Industrial Site to treat groundwater associated within initial and ongoing (“maintenance”) dewatering of the underground mine workings. A new aboveground pipe would convey treated water from the water treatment plant along an existing dirt road to the planned discharge point at South Fork Wolf Creek. The pipe and discharge point are located entirely within the property boundaries.

Engineered fill generated by the proposed mining activities would be placed on approximately 31 acres of the Brunswick Industrial Site to create a level pad of approximately 21 acres for potential future industrial use. In total, up to approximately 60 acres of the 119-acre site could be subject to surface disturbance and/or development for the aboveground facilities and fill placement. The remaining 59 acres would remain undeveloped and would not be subject to surface disturbance or infrastructure improvements.

Engineered fill would also be placed on the Centennial Industrial Site, provided that the separate DTSC cleanup project has been approved and completed on the Centennial Industrial Site. In that case, engineered fill would be transported by truck from the





Brunswick Industrial Site and placed on approximately 44 acres of the Centennial Industrial Site to create approximately 37 acres for potential future industrial use. The remaining approximately 12 acres would remain as a private driveway for site access and open space. The open space area would include Wolf Creek, a 100-foot setback for riparian area on Wolf Creek, and an undisturbed area providing protection for identified special-status plant species.

After full placement of fill at the Centennial and Brunswick Industrial Sites to the pad design elevations, the need for hauling of engineered fill would continue due to ongoing mining over the Use Permit term of 80 years, and thus, hauling would shift entirely to local and regional markets for sale as construction aggregate and fill. If the separate DTSC cleanup project is not approved by DTSC and completed within the term of the Idaho Maryland Mine Project use permit, engineered fill would be placed on the Brunswick site, but not the Centennial site, and the remainder would be hauled to local and regional markets.

A buried potable water pipeline would be constructed as part of the proposed project to provide water to residences along a portion of East Bennett Road. The pipeline would extend an existing NID potable water pipeline along an approximately 1.25-mile segment of East Bennett Road to provide potable water service to residential properties currently on wells that may be affected by the project's dewatering of the mine. NID would be the water supplier for the potable water service.

Statement for consideration:

Thank you for taking the time to read my response to the Draft Environmental Impact Review (DEIR) prepared by Raney Planning and Management Inc, 2021. I am regularly in the Planning Department trying to get new development and projects approved because I support development and expansion that benefits our local community and the economy. I do not believe that the re-opening of the Idaho Maryland Mine qualifies as a beneficial project to our community. Based on the DEIR and associated documents; it's frustrating that this project still has to be considered by our environmentally aware and community minded staff, but understand that you are required to do your due diligence prior to denial of such a project and hope to assist in shedding a light on several areas that seem insufficiently addressed by the DEIR.

Ind 577-3

First, I would like to formally request that another *Draft* Environmental Impact Review be prepared and be re-circulated through the public as the existing version is grossly negligent and jumping directly to a Final Environmental Impact Review does not allow an opportunity for the community to verify that the great number of concerns expressed regarding the released DEIR during the March 24<sup>th</sup> 2022 Planning Commission hearing, as well as in writing during the hearing period, are being addressed to an appropriate and satisfactory degree.

The Initial DEIR (Raney Planning and Management Inc 2021) section 1.1 states 'As provided in the CEQA Guidelines Section 15021, public agencies are charged with the duty to **avoid or minimize environmental damage where feasible**. The public agency has an obligation to balance a variety of public objectives, including economic,



*environmental, and social issues.'* In consideration of this guideline, we'd like any conclusions by the department to be reserved until the Economic Impact Review has also completed both the Draft public circulation with hearing period and adjusted to a Final Economic Impact Review in addition to a much more thorough Draft Environmental Impact Review.

Ind 577-4

Section 1.3 – Approach to Centennial Site Baseline

The Initial DEIR (Raney Planning and Management Inc 2021) states *'The CEQA Guidelines, and the courts, have noted that in some situations, the physical conditions existing at the time the environmental analysis commences (e.g., for an EIR, the Guidelines describe this as publication of the Notice of Preparation [NOP]) do not always provide the most accurate and understandable picture practically possible of the project's likely impacts. For example, Guidelines Section 15125(a)(1) states that, "...where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."*

The terminology of the CEQA guidelines specifically states that in order to provide the most accurate picture possible it either needs to be based on already existing conditions or must be supported with substantial evidence. Therefore, we can safely conclude that either the Voluntary Cleanup Agreement (VCA; Docket No. HSA-FY18/19-014) with the Department of Toxic Substances Control (DTSC) for the voluntary cleanup of soil contamination on the Centennial Industrial Site be considered within the EIR or should be fully completed with written project approval, including final soil samples and environmental evaluations, from the DTSC prior to the DEIR removing it from consideration.

Ind 577-5

Section 1.4 Independent Utility

The Initial DEIR (Raney Planning and Management Inc 2021) states *'The utility and purpose of the Centennial Clean-Up Project is to ensure timely and efficient cleanup of the Centennial Industrial Site due to existing site conditions, and is required under both California and federal environmental regulations—not because it would benefit the Idaho-Maryland Mine Project. Similar to the holding of Banning Ranch, the Centennial Clean-Up Project would happen whether or not an underground mine is approved by Nevada County for the Brunswick Industrial Site. As stated above, the Centennial Industrial Site was identified by the EPA for cleanup purposes long before Rise purchased either the Centennial or Brunswick properties, and long before the Idaho-Maryland Mine Project was proposed. Consequently, under the holding in Banning Ranch, the Centennial Clean-Up Project should be analyzed separately from the Idaho-Maryland Project under CEQA.'*

The statement *'not because it would benefit the Idaho-Maryland Mine Project.'* is completely outlandish considering that Rise Grass Valley clearly states their intention to utilize the Centennial site and purchased both the Centennial site and the Brunswick site in conjunction. They claim that there is *'sufficient flexibility in the project design such that waste rock could first be deposited at the Brunswick Industrial Site.'* If the





Ind 577-6

Centennial cleanup is not considered within the DEIR, then the entire DEIR should ONLY consider waste rock being deposited at the Brunswick Industrial site or an alternative. Additionally, Rise Grass Valley voluntarily entered into the Remediation Action Plan (RAP) independently of the Idaho Maryland Mine project so the company should be moving forward with that agreement regardless of the Idaho Maryland projects' progress and their lack of efforts towards that commitment shouldn't be rewarded by overlooking it.

**Section 4.10 Noise and Vibration**

The Nevada County noise ordinance states dB readings at project property lines must adhere to the limitations set forth in the Nevada County Ordinance No. 1853, adopted by the Board of Supervisors on January 18, 1994. Digging into the DEIR's continued short comings, on page 4.10-4 under Existing Sensitive Receptors it states '*For the purposes of this analysis, 30 receptors were selected as representative of the nearest potentially affected receptors to the project sites (see Figure 4.10-2). The receptors consist of the following locations:*

- 17 residences surrounding the Brunswick Industrial Site.
- 3 residences near the Centennial Industrial Site.
- 1 residence along Whispering Pines Lane between Brunswick Road and Centennial Drive.
- 5 residences along Brunswick Road, north of East Bennett Road.
- 4 residences along East Bennett Road.'

Please notice that NONE of these receptors are at the adjacent property line, in fact ALL of them are some great distance further, some multiple parcels away even. Although several of these off-site receptors, particularly where truck traffic noise is considered, are valid noise monitoring locations there should additionally be sounds tests taken at all parcel boundaries in the revised Draft Environmental Impact Review.

Pursuant to Nevada County Land use and Development Code (NCLUDC), Section L-II 4.1.7 Noise, A, defines its purpose '**Purpose-** *The purpose of these regulations is to ensure that future development **minimizes unnecessary and annoying noise**, by establishing maximum noise levels and standards for evaluating potential noise impacts.'*

TABLE 4.10-1  
Noise Sensitive Land

Receptor Name	Address	Distance (ft)	Distance (mi)	Direction	Notes
1	10000 N. 1000 E. St.	1000	0.019	N	
2	10000 N. 1000 E. St.	1000	0.019	N	
3	10000 N. 1000 E. St.	1000	0.019	N	
4	10000 N. 1000 E. St.	1000	0.019	N	
5	10000 N. 1000 E. St.	1000	0.019	N	
6	10000 N. 1000 E. St.	1000	0.019	N	
7	10000 N. 1000 E. St.	1000	0.019	N	
8	10000 N. 1000 E. St.	1000	0.019	N	
9	10000 N. 1000 E. St.	1000	0.019	N	
10	10000 N. 1000 E. St.	1000	0.019	N	
11	10000 N. 1000 E. St.	1000	0.019	N	
12	10000 N. 1000 E. St.	1000	0.019	N	
13	10000 N. 1000 E. St.	1000	0.019	N	
14	10000 N. 1000 E. St.	1000	0.019	N	
15	10000 N. 1000 E. St.	1000	0.019	N	
16	10000 N. 1000 E. St.	1000	0.019	N	
17	10000 N. 1000 E. St.	1000	0.019	N	
18	10000 N. 1000 E. St.	1000	0.019	N	
19	10000 N. 1000 E. St.	1000	0.019	N	
20	10000 N. 1000 E. St.	1000	0.019	N	
21	10000 N. 1000 E. St.	1000	0.019	N	
22	10000 N. 1000 E. St.	1000	0.019	N	
23	10000 N. 1000 E. St.	1000	0.019	N	
24	10000 N. 1000 E. St.	1000	0.019	N	
25	10000 N. 1000 E. St.	1000	0.019	N	
26	10000 N. 1000 E. St.	1000	0.019	N	
27	10000 N. 1000 E. St.	1000	0.019	N	
28	10000 N. 1000 E. St.	1000	0.019	N	
29	10000 N. 1000 E. St.	1000	0.019	N	
30	10000 N. 1000 E. St.	1000	0.019	N	

(NCLUDC), Section L-II 4.1.7. D. 5. states '*The above standards shall be measured only on property containing a noise sensitive land use, including residences, schools,*



↑  
hospitals, nursing homes, churches, and libraries, and may be measured anywhere on the property containing said land use. However, this measurement standard may be amended to provide for measurement at **the boundary of a recorded noise easement** or as determined in a recorded letter of agreement between all affected property owners and approved by the County.' This clearly specifies either on the land itself or its boundary.

Ind 577-7  
Further down Section L-II 4.1.7. D.7. states 'Because of the unique nature of sound, the County reserves the right to provide for a **more restrictive standard** than shown in the Exterior Noise Limits Table. The maximum adjustment shall be limited to be not less than the current ambient noise level and shall not exceed the standards of this Section. Imposition of a noise level adjustment shall only be considered if one or more of the following conditions are found to exist:

a. Unique characteristics of the noise source:

- 1) The noise contains a very high or low frequency, is of a pure tone (a steady, audible tone such as a whine, screech, or hum), or contains a wide divergence in frequency spectra between the noise source and ambient level;
- 2) The noise is impulsive in nature (such as hammering, riveting, or explosions), or contains music or speech;
- 3) The noise source is of a long duration, defined as a cumulative period of more than thirty minutes in any hour.'

Given the projects proposal of noise sources of a long duration (more than 30 minutes in any hour) we would like to request the County exercise their right to provide for a more restrictive standard than shown in the Exterior Noise Limits Table.

Ind 577-8  
The Occupational Safety and Health Act (OSHA) has declared excessive noise levels a recognized hazards to safety and health, influencing NCLUDC Section L-II 4.1.7.D.4. enough to clearly state 'Where 2 different zoning districts abut, the standard applicable to the lower, or more restrictive, district plus 5 dBA shall apply.' Unfortunately, our applicants seem unaware of the NCLUDC when the DEIR Section 4.6 Geology, Soils and Mineral Resources (page 4.6-23) Policy 17.24 states '**Regardless of the General Plan designation, subsurface mining shall be conditionally permitted throughout the County.**' The DEIR neglects to clarify the depths of any of this subsurface mining and the mitigation measures to assure that the minimum noise levels during night time hours under 900 privately owned parcels, including many residences, shall be adhered to, particularly as they pertain to the zoning of the parcel being effected. Their abrasive statement 'regardless of general plan designation,' implies that Rise Grass Valley has no intention of adhering to the sound standards adopted by the County's Board of Supervisors while conducting the anticipated '257 detonators per day to facilitate Rise's mining operations at the Brunswick Industrial Site' or as stated later 'on a single delay, for a total of 26.6 lbs of explosive being detonated'.





Ind 577-9

It's also worth noting that according to table 14.10-1 (page 4.10-8) the ambient noise levels were tested greater than 3 years ago, some over 5 years ago. A sound analysis utilizing data from an irrelevant time period is not applicable to science and the entire sound analysis should have to be re-created using verifiable, current and accurate data.

**DEIR - Missing Sections and Items**

The Draft EIR is missing any effects of this project as they pertain to the ever-intensifying fire season, along with many other absences. Please see some of those concerns below.

**Explosives vs. Fire Risk**

Nowhere in the DEIR is there data referencing the transportation of explosives against vehicle crash statistics, specifically along hwy 174. It is imperative that we apply some basic math and statistics before agreeing to send a bi-weekly (sometimes weekly) deliveries of the 28 tons of explosive material down a roads pass near residences and through highly flammable natural vegetation. The ignition force of 28 tons of explosive (ammonia nitrate fuel oil [ANFO] and packaged or bulk emulsion explosives) should be considered with calculations about the distance of potential flame and explosive force with an overlay of the vegetation, homes and business along the transportation route. Additionally, these calculations should be considered at the unloading and loading areas in case of an accidental ignition. This review should be overseen by CalFire, Pearldale Chicago Park, Ophir and Nevada County Consolidated Fire Districts as the leading experts in what would be a realistic expectation of fire expansion and the resources required to control it. In a county where we do not allow generator use, unless as a backup system that has been tied into a fully engineered and permitted power grid, we clearly understand fire risk and the rapidity of ignition in a dry climate. To not even consider the resources that would be required to quickly neutralize the effects of an accidental car crash carrying 28 tons of explosives is grossly negligent. With expected bi-weekly transport for an 80 year period we would need to consider over 2000 truck loads. There is also a continued drought and the predicted decline in watershed should be considered in all calculations. In the case of an explosive load, even a small portion of the load igniting will ignite the remaining load for the full qty being transported to cause the full devastating effects of the maximum capacity.

Ind 577-10

Ind 577-11

Not considering the effects or mentioning the possibility of an explosion within the DEIR can only be interpreted as an attempt to shield the subject from the reviewing committee, knowing the risk associated with the proposal is well beyond any reasonable level. When the DEIR states '*Additionally, the explosives supplier will have a sufficient insurance policy*' (Chapter 3.0 Project Description, Page 3-28, Other Truck Transport, Explosives) it should further be clarified that the aforementioned insurance policy is considered sufficient to rebuild the homes and businesses that are directly threatened by this proposal and compensate the local fire jurisdictions for resources pulled from other locations due undue risk on a continuously arduous fire season. And lastly, we can all agree that no insurance policy is ever sufficient to cover the loss of life or loved ones.





**Ind 577-12** Given the public and official reaction to one 'possible stick of old dynamite' that shut down Nevada City's downtown area to traffic and businesses on March 30th, we Nevada County Residents take the threat of explosives slightly more seriously than Rise Gold does.

**Ind 577-13** Section 4.11 Public Services and Utilities makes a brief mention of the staffing requirements of local Fire Districts, but there is no mitigation suggested for additional staffing or equipment that this project warrants with the power usage of approximately 6000 homes, transportation of explosives and assorted industrial buildings and equipment.

**Ind 577-14** Explosive vs. Legal Shipping Route  
\*See Reference Link at Bottom of Letter\*  
According to the Highway Patrol Handbook 84.3, Section 3. CALIFORNIA VEHICLE CODE, SECTION 31602. LICENSE: ROUTES TO BE USED (d) '*It is a **misdemeanor** for the owner, or authorized agent of the owner, of any vehicle transporting explosives to drive, or to permit the driving of the vehicle, or for the driver to drive such vehicle, upon any public highway , **not designated in regulations adopted by the Department of the California Highway Patrol as a route for the transportation of explosives, unless the use of the highway is required to permit delivery of, or the loading of, explosives at a point not on a highway designated as a route for the transportation of explosives, or unless the use of the highway is required to permit the vehicle to proceed to, and return from, a point designated as an inspection stop pursuant to this division.***' However, if you look at map 6 (including the greater Grass Valley area) Hwy 174, access to the Brunswick site, is not even listed as a route for transportation explosives. Overlooking this detail is once again, gross negligence.

**Ind 577-15** Collapsed Tunnels and Sink Holes  
The CEO and sole member of Rise Grass Valley, Benjamin Mossman, proudly proclaimed in an interview on 'Nevada County Now, August 2020' that all the '*all the land is privately owned, so the resources belong to Rise Gold.*' Unfortunately, Ben is correct about the mineral rights included within 2600+acres, however the DEIR does not address how this could affect the 900 privately owned parcels above the mineral rights and interlaced tunnels that not only weave through private neighborhoods and crucial water reserves, but also under a portion of Grass Valley's city limits including the Grass Valley Airport.

**Ind 577-16** Searching no further than the Wolf Creek Park walking trail, located in Grass Valley, you can see the devastating effects of a massive sink hole behind the Les Schwab and Tripp's Auto Body. The DEIR does not address the depths at which mineral rights are available, therefore there is no valid evidence that underground blasts wouldn't affect assorted private parcels from foundation damage to sound annoyance.

**Ind 577-16** Additionally, there is no geotechnical underground data with regards to the subsurface tunnels under the airport. Nor are there any mitigation measures to offsite fire



↑ protection, should an unfortunate tunnel collapse damage the Grass Valley Airport runway that doubles as the Grass Valley Interagency Air Attack Base for local and statewide, fire spotting and suppression aircrafts.

**Ind 577-17** There is no doubt that Nevada County is filled with known faults, and even less doubt that California is a seismic region. Rise Grass Valley is proposing that there is no risk to blast explosives underground within 200 feet of a known fault.

**Ind 577-18** Section 4.9 Land Use and Population and Housing, on page 4.9-22 states *'The project also includes a request to amend the Final Map for the formerly proposed Bet Acres Subdivision recorded in February 1987, in Book 7 of Subdivision Maps at Page 75, to remove the "200' Building Setback from Fault", as shown on Sheet 4 of Final Map #85. Sheet 4 of the Final Map includes a portion of the Brunswick Industrial Site. The Final Map shows the location of where Anderson Geotechnical Consultants had believed a fault to be, based on their previous site investigations, and depicted it as a straight dashed line with two parallel lines located 200 feet either side, presumably showing Anderson's suggested setback distances for building construction. Substantial evidence is provided in the Geology, Soils, and Mineral Resources of this EIR (Chapter 4.6, see Impact 4.6-1), indicating that the area is not seismically active, and thus, building setbacks are not required. Sec. L-IV 2.18 of the County Subdivision Ordinance allows for corrections and amendments to an approved tentative map, recorded final map or a parcel map, if the amendments have a cumulatively minor effect on the subdivision and its impacts. The proposed changes to the map or to conditions of approval must be considered at a public hearing by the original approval body.'*

There are two very important take aways from the DEIR's own wording. The first and possibly most crucial is their statement *'Substantial evidence is provided in the Geology, Soils, and Mineral Resources of this EIR (Chapter 4.6, see Impact 4.6-1), indicating that the area is not seismically active'* is wildly unpredictable and probably erroneous. Perhaps it's not an active fault today, however a few blasts of dynamite could quite easily change that. If we start ignoring setbacks as they pertain to fault lines, then where and with who do we draw the line. We already have hundreds of existing sink holes within Nevada County from fault shifts and collapsed mining tunnels. There should be additional data in regard to the effects of explosions near known faults and their consequences included within the DEIR.

The second take away is the *'The proposed changes to the map or to conditions of approval must be considered at a public hearing by the original approval body,'* Which signifies that the rezoning and map amendments must be considered at a public hearing, entirely separate to the Proposal to reopen the Idaho Maryland Mine.

**Ind 577-19** Water Usage vs. Discharge  
Rise Gold claims the settling ponds are sufficient for the qty of water discharged daily, however the math is non-complete. Continuously filling and draining bodies of water do not 'settle'. The DEIR should include calculations that show there is enough time to elapse to allow for the weekly output to settle prior to adding or circulating additional water.

↓



↑ The maximum daily water output should be conjoined with the 100 yr. flood calculations the length of the discharge route. Additionally it should be overlayed with the FEMA flood map from Wolf Creek all the way to the Bay to confirm that should a 100 year flood happen in conjunction with a maximum rate of discharge Wolf Creek, or the continued bodies of water, won't adversely affect surrounding areas.

Economic Impact Review

This project is undeniably incomplete without an Economic Impact Review. Although we can see that Rise Gold has already spent over \$634,000 in permit fees directly paid to Nevada County it is hard to see how the economic influx could continue after operation begins. With the bulk of taxes for gold mining going to the state and federal agencies I fear Nevada County will be left in the dust, with additional housing needs and no real new jobs for existing residents.

Currently employment is at a record high and a quick walk around Nevada County displays more 'Help Wanted' signs than one could count. The Economic Impact Review should include the qualification requirements for the available positions as they relate to the unemployed in Nevada County. Almost assuredly they will not align.

Ind 577-20

Additional calculations should include the approximate cost of water per gallon (\$2 per gallon at your local supermarket) vs. the amount of 'potable' water being discharged and flushed down Wolf Creek. And the average cost of purchasing land per SF on an average throughout the 2600+ acres of mineral rights vs. the 'high yielding' 27 grams of gold per metric ton of earth. 27 grams of gold is slightly less than an ounce, which today retails for approximately \$2,000 once minted. The immediate \$2,000 value seen would have to deduct the costs of mining, taxes, minting and retail to get the actual value as it relates to blowing up a section of earth that is larger than my front yard. I'd rather have my yard, as would my realtor.

Water discharged from Rise Grass Valley is stated to be 'potable' however there is also proposed water usage at the mining sites. The water discharged should go into a reservoir system to not only supply the mining operations but also to have a large reserve for fire suppression, potential city usage in an emergency, and available to all residents who are at risk of losing their well for no additional cost. If an additional cost is proposed for water rights to the residents the cost of water purification and distribution should additionally be considered within the Economic Impact Review.

Please Consider

General Plan Policy 17.14 states that *'existing development - commercial, residential, and community - as well as undeveloped private lands, shall be protected from adverse environmental effects caused by mining through enforced use permit conditions and mitigations measures, or denial of the projects.'*

Ind 577-21

I would like to emphasize that last option, denial of the projects.

In 2018 permit CC18-0025 shows us that during the ownership of Rise Gold there was a code compliance violation 12301 Mill Site Rd in Grass Valley. A parcel that butts up

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↑  
against Wolf Creek and numerous active businesses within the Grass Valley city limits. There were several missteps from Rise Grass Valley during that time, the negligence regarding 100' setback around streams and waterways, namely the 'protected' Wolf Creek and a timber harvest without a permit. These are two of the most standardized and basic requirements across the county and include oversight by several statewide governing agencies, namely CalFire, the CDFW and the Waterboard. Please consider those code violations as an indication of how little this company understands or respects the local ordinances, regulations, and community. Or perhaps the unthinkable is true and Ben was right, he, the sole member of Rise Gold, does indeed own all the resources throughout 900 private Nevada County parcels, along Wolf Creek and under our only Fire Base Airport?

I thank the Matt Kelley, Nevada County Planners and the Planning Commission for taking the time to consider my letter.

Sincerely,



Menkin Nelson

High Pockets LLC

PO Box 173  
Nevada City, CA 95959  
(530) 955-3129

#### References

\*1 – Highway Patrol Handbook 84.3 link below\*

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## **INDIVIDUAL LETTER 577: MENKIN NELSON**

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### **Response to Comment Ind 577-1**

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 577-2**

The commenter reproduces portions of the Project Description. No response is required.

### **Response to Comment 577-3**

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

The commenter states that the DEIR is grossly negligent but provides no further information. Therefore, no response is necessary. The commenter requests that the DEIR be revised and recirculated. The County has determined that recirculation of the DEIR is not required as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met.

### **Response to Comment Ind 577-4**

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

### **Response to Comment Ind 577-5**

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

### **Response to Comment Ind 577-6**

The commenter states that no sensitive receptors for the noise analysis are adjacent to the property boundary of the project sites. The commenter states there should be sound tests taken at all parcel boundaries for the analysis of the DEIR, and that pursuant to Section L-II 4.1.7 of the Nevada County Land Use and Development code, noise levels and standards should be determined either on the land itself or its boundary.

Please see Response to Comment Ind 617-5.

### **Response to Comment Ind 577-7**

The commenter's request has already been considered in the DEIR. As discussed on page 4.10-16, as described in Footnote B of Table 4.10-4, a +5 dB adjustment to the noise standards would be applicable at all residential receptors due to the differing zoning districts. However, the +5 dB adjustment would be negated by a -5 dB adjustment due to the project noise sources occurring for long durations. As a result, the only adjustment applied to the Table 4.10-4 standards were based on ambient conditions.

### **Response to Comment Ind 577-8**

No blasting noise would propagate through the solid rock between the underground mine to properties on surface. Please see Master Response 7 - Location of Future Mining Areas. The noise from underground blasting, at the shaft headframe, has been analyzed in the DEIR and was found to be less than significant (see page 4.10-44 of the DEIR).

### **Response to Comment Ind 577-9**

Please see Response to Comment Ind 617-4.





### **Response to Comment Ind 577-10**

The project does not propose any trucking along Highway 174. Please see Master Response 10 - Explosives, Reagents, and Brunswick Fill.

The commenter speculates that trucks carrying explosives may explode along Highway 174. However, there is no evidence of a significant risk of this occurring. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.”

### **Response to Comment Ind 577-11**

Mitigation measure 4-7-1(c) requires the mine operator to ensure, through the enforcement of contractual obligations, that all contractors or suppliers transport explosives in a manner consistent with all applicable regulations and guidelines. Proof of the agreement between the operator and contractor or supplier transporting explosives shall be provided to the Nevada County Planning Department before transporting explosives to the site. Insurance for explosives transport is regulated by 49 CFR 387 as shown in Table 4.7-2 of the DEIR. Please see Master Response 10 - Explosives, Reagents, and Brunswick Fill. As stated in Response to Comment Ind 577-10, explosion of trucks, which is highly regulated by the government, is speculative and not required to be analyzed in an EIR.

### **Response to Comment Ind 577-12**

Comment noted.

### **Response to Comment Ind 577-13**

As discussed on page 4.11-19 of the DEIR, consistent with Appendix G of the CEQA Guidelines, determination of significant impacts for public services is based on whether the proposed project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services.

The approach to analyzing a project’s impacts on fire protection services, pursuant to CEQA, is often misunderstood. Industry practice has often focused on any type of demand upon a fire department or district that may be generated by a project, such as an increased need for staffing, or the need for new firefighting equipment. These are important considerations, but they are not CEQA considerations per se. This important point can be seen by a careful reading of the language in Appendix G of the CEQA Guidelines (Section XV. Public Services). As discussed above, the language focuses on whether a project’s increase in demand is such that a fire service provider would need to build new or expand existing governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives. The reason for this focus is that building new facilities, or expanding existing facilities, requires construction activities and disturbance of the physical environment, which is the focus of CEQA.

According to CEQA Guidelines Section 15002(g), a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project. “Environment” means the physical conditions that exist within the area



which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance (PRC Section 21060.5).

The courts have affirmed this understanding. In the case *City of Hayward v. Board of Trustees of the California State University*, the First District Court of Appeal affirmed that the focus of CEQA analysis should be limited to physical environmental impacts related to a project.<sup>2</sup> The court held that, “The need for additional fire protection services is not an *environmental* impact that CEQA requires a Project Proponent to mitigate.”

The commenter does not explain how the project’s power consumption or transportation of explosives would result in public services demand that would necessitate the need for new or physically altered governmental facilities, thus potentially causing an environmental impact.

#### **Response to Comment Ind 577-14**

The project does not propose any trucking along Highway 174. Please see Master Response 10 - Explosives, Reagents, and Brunswick Fill.

#### **Response to Comment Ind 577-15**

Please see Chapter 4.6 of the DEIR and Master Response 29 – Near Surface Workings, and Master Response 7 – Location of Future Mining Areas.

#### **Response to Comment Ind 577-16**

Please see Chapter 4.6 of the DEIR and Master Response 29 – Near Surface Workings.

#### **Response to Comment Ind 577-17**

Please see Chapter 4.6 of the DEIR regarding seismicity of the project area.

The magnitude of the energy released during mining excavations by rock removal and rock placement is much smaller than the magnitude of energy activation required to trigger the release of a local pre-Holocene fault. No analysis was performed nor is necessary, as there is no potential for inducement of seismic activity on these faults from the proposed mining activity. Please see NV5 Memo attached to the Final EIR as Appendix P.

#### **Response to Comment Ind 577-18**

As discussed in Section 4.5-1 of the DEIR, based upon this substantial evidence in the record, the project includes a request to amend the Final Map for Bet Acres recorded in February 1987 in Book 7 of Subdivision Maps at Page 75 to remove the “200’ Building Setback From Fault”, as shown on Sheet 4 of Final Map #85.

In addition, a management plan was prepared pursuant to Nevada County LUDC Section L-II 4.3.8 to address potential seismic hazards associated with the previously-identified inferred fault alignment. It is NV5’s professional opinion that the subject fault, identified on the property in Map 85-7, does not qualify as a seismically active area as defined by Nevada County LUDC Section L-II 4.3.8.B, and the proposed project development within the designated building setback fault zone is generally feasible from a geotechnical engineering standpoint. ECM, the County’s independent peer review consultant for this project, concurred with NV5’s professional opinion, after reviewing the data.

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<sup>2</sup> First District Court of Appeal. *City of Hayward v. Board of Trustees of the California State University*. (November 30, 2015) 242 Cal.App.4th 833.



While the analysis shows that an active fault likely does not exist, out of an abundance of caution, the County has concluded that a significant impact could occur without mitigation. Mitigation Measure 4.6-1 requires that prior to approval of Improvement Plans, the design recommendations from the Brunswick Industrial Site Geotechnical Report (November 18, 2019) shall be incorporated into the Plans to the satisfaction of the Nevada County Building Department. The rezoning and map amendments would be considered at the same hearing as the other entitlements for the project, and contrary to the commenter's suggestion, there is no requirement that such approvals be heard at a separate hearing.

#### **Response to Comment Ind 577-19**

In addition to settlement in the water treatment pond, the water treatment plant includes media filtration. Please see Appendix K.4 of the DEIR. The treated mine water discharge will be required to meet regulatory requirements for total suspended solids. Please see Master Response 35 – Discharge to South Fork Wolf Creek.

As stated on Page 4.8-70 of the DEIR, at the Brunswick Industrial Site, a detention basin would be constructed at the downstream toe of the engineered fill placement slopes, above South Fork Wolf Creek. The detention basin for the Brunswick Industrial Site is sized to detain storm flows to compensate for the quantity of treated mine water discharged to South Fork Wolf Creek, in addition to compensating for increased runoff from potential future industrial development of the site. During larger storm events, the proposed detention pond on the Brunswick Industrial Site would reduce the peak flows within South Fork Wolf Creek by much more than 5.6 cfs, as shown in Table 4.8-4. Thus, under project conditions, the overall peak storm flows would be lower than they are under existing conditions and therefore would not contribute to increased flooding downstream.

#### **Response to Comment Ind 577-20**

Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

As discussed on page 10 of Appendix N of the DEIR, the proposed project will have a surplus of water from the natural groundwater flow into the ground workings. Once the initial dewatering is completed, approximately 1,224,000 gallons per day are estimated to be pumped to the surface on an on-going basis to maintain the dewatered mine. The groundwater consumed during operations is estimated to be 84,000 gpd. As stated on page 2 of Appendix N, the mine would have a positive effect on water supply. NID could adjust its flows upstream to use the extra water available downstream if it desired to. The construction of a reservoir large enough to impound this quantity at the project site is not realistic nor feasible and would likely cause additional environmental impacts due to disturbance of other resources on the surface.

#### **Response to Comment Ind 577-21**

Please see Master Response 3 – Operator Responsibility.



**Individual Letter 578**

**From:** Mike Brisson <mikebrisson49@gmail.com>  
**Sent:** Sunday, April 3, 2022 7:01 AM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** I Vote No on the Rise Gold Idaho Maryland Mine

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- |                   |   |
|-------------------|---|
| <b>Ind 578-1</b>  | <p>Dear Board of Supervisors</p> <p><b><u>This letter is to inform you that I do not approve of the opening of the Rise Gold Idaho Maryland Mine.</u></b></p> <p><b>I agree with all of the top concerns listed below:</b></p>                    |
| <b>Ind 578-2</b>  | <ul style="list-style-type: none"> <li>• The groundwater model has fundamental flaws in the initial start point and baseline data assumptions – all of which throw off the entire analysis.</li> </ul>  |
| <b>Ind 578-3</b>  | <ul style="list-style-type: none"> <li>• Dealing with mine waste – Asbestos will be a huge and expensive problem that requires far more comprehensive management than described in the report.</li> </ul>   |
| <b>Ind 578-4</b>  | <ul style="list-style-type: none"> <li>• Greenhouse gas emissions - The report excluded elements that would put the project over an arbitrary threshold limit, but recent climate change goals say the threshold should be "net zero".</li> </ul> |
| <b>Ind 578-5</b>  | <ul style="list-style-type: none"> <li>• Cleanup of the toxic, pre-superfund Centennial site that would be used to dump mine waste is not included in the DEIR but is required by the California Environmental Quality Act (CEQA).</li> </ul>     |
| <b>Ind 578-6</b>  | <ul style="list-style-type: none"> <li>• Missing construction time estimates throw off the entire analysis of noise, traffic, and air.</li> </ul>   |
| <b>Ind 578-7</b>  | <ul style="list-style-type: none"> <li>• The DEIR incorrectly assesses nighttime noise and underestimates the noise of dumping mine waste near established residential neighborhoods.</li> </ul>  |
| <b>Ind 578-8</b>  | <ul style="list-style-type: none"> <li>• Air traffic hazards and aesthetic impacts need to be studied further due the likelihood of a moisture cloud plume that could be created by warm, saturated air ventilation.</li> </ul>                   |
| <b>Ind 578-9</b>  | <ul style="list-style-type: none"> <li>• Blasting plans don't follow U.S. mining guidelines that restrict blasting during evening hours.</li> </ul>   |
| <b>Ind 578-10</b> | <ul style="list-style-type: none"> <li>• The plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant.</li> </ul>  |
| <b>Ind 578-11</b> | <ul style="list-style-type: none"> <li>• Meteorological data used to assess the health risk of airborne pollutants doesn't fit Grass Valley's profile or accurately reflect local conditions.</li> </ul>  |
| <b>Ind 578-12</b> | <p>:Thank you,<br/>         Michael Brisson<br/>         20693 Dog Bar Road<br/>         Grass Valley, CA 95949<br/>         530-913-2724</p>   |





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## **INDIVIDUAL LETTER 578: MICHAEL BRISSON**

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### **Response to Comment Ind 578-1**

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 578-2**

The commenter states that the groundwater model has fundamental flaws and assumptions but does not provide specific reasons and only includes vague references to the "initial start point" and "baseline data assumptions."

The DEIR examined groundwater-related impacts extensively. That analysis may be reviewed at DEIR Chapter 4.8 – Hydrology and Water Quality, the Groundwater Hydrology and Water Quality Analysis (Appendix K.2), the Groundwater Model Report (Appendix K.3), the Preliminary Drainage Analysis (Appendix K.5), and the West Yost Peer Review (Appendix K.7.) The commenter is also directed to Master Response 13 – Historic Hydrogeologic Assessments, and Master Response 14 – Adequacy of Groundwater Model.

### **Response to Comment Ind 578-3**

The commenter states that the DEIR should include more comprehensive management of asbestos but the commenter does not explain how the DEIR is inadequate in this regard. The commenter is directed to Chapter 4.3 of the DEIR which analyzes asbestos in the context of air quality impacts and Master Response 4 - Conservatism of Asbestos Assumptions.

### **Response to Comment Ind 578-4**

The commenter states that the DEIR excluded elements that would cause the project to exceed the GHG emissions threshold, but does not explain what elements were excluded. A net zero threshold for GHG emissions is not required for the project. Please see Master Response 27 - Greenhouse Gas Thresholds.

### **Response to Comment Ind 578-5**

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

### **Response to Comment Ind 578-6**

The commenter states that the DEIR does not discuss construction time estimates which impacts the noise, traffic, and air analyses. Please see Master Response 24 – Project Construction Schedule. As discussed in Master Response 24, the project assumes a compressed construction schedule where many activities overlap to provide the most conservative estimate of air quality, traffic, noise and other impacts. An increase in the duration of construction activities and/or the completion of activities sequentially would serve to reduce estimates of environmental impacts in many areas. As such, the approach taken by the DEIR overestimates impacts as compared to a longer construction schedule with less overlapping activities.

### **Response to Comment Ind 578-7**

The commenter states that the DEIR incorrectly assesses nighttime noise and underestimates noise from dumping of mine waster but does not provide specific reasons as to how the DEIR is inadequate. The DEIR discusses noise impacts in Chapter 4.10, Noise and Vibration. In addition, please see Responses to Comments Grp 21-130 and Grp 21-131.





**Response to Comment Ind 578-8**

The commenter states that the DEIR must discuss the potential for moisture cloud plumes and associated impacts to aesthetics or air traffic hazards. Moisture clouds from mine ventilation are not expected to occur and would not cause air traffic hazards or change the significance conclusion of the DEIR for aesthetics. Please see Response to Comment Grp 7-95.

**Response to Comment Ind 578-9**

Please see Response to Comment Grp 21-144.

**Response to Comment Ind 578-10**

The commenter states that the DEIR does not demonstrate that the impacts to biological and aquatic responses would be less than significant, but fails to provide specific reasons why the DEIR is inadequate. The DEIR discusses impacts to biological resources in Chapter 4.4 and impacts to hydrology and water quality in Chapter 4.8.

**Response to Comment Ind 578-11**

The commenter states that meteorological data used to assess the health risk of airborne pollutants does not fit Grass Valley's profile or accurately reflect local conditions. The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA.

**Response to Comment Ind 578-12**

This comment is the signature line of the comment letter. A response is not required.



Individual Letter 579

Ind 579-1

To whom it may concern:

3/9/2022

The Idaho-Maryland Mine Project is a bad idea for the community. I am writing from Philadelphia, PA, and am the son-in-law of a Grass Valley resident, Caroline Courtright. I have been a corporate bond analyst for 16 years, covered the metals and mining sector for roughly 5 years, and that included gold miners. So, my perspective is from a financial analyst. That said, I am writing you on a personal level and not from my employer's perspective. I assume you will hear significant doubts about the negative environmental impacts the mine will have from other concerned citizens. Even though I agree with the opponents of the mine reopening on an Environmental, Social, and Governance (ESG) basis, I wanted to provide doubts on a financial basis.

Caroline told me about the potential of the mine reopening about 10 years ago following gold prices rising during that time. I thought it would be a near impossible act to reopen the mine in the middle of two cities then, largely because it would be too expensive to restart and operate the mine among an area that values the environment the way Nevada County residents do. Recently, I learned of the EIR that supports the mine reopening, so I wanted to learn more about the project as a potential investment, after all, Rise Gold is a publicly traded company.

Ind 579-2

I am appalled by the fact that there is so little financial information available from Rise Gold. Other investable gold miners utilize a metric called "All-In Sustaining Costs" (AISC) to describe the cost to produce one ounce of gold. AISC's line items include cost of sales excluding depreciation and amortization, royalties, and production taxes but includes treatment and refinement charges. In addition, AISC's additional costs include sustaining capital expenditures, leases, general and administrative costs, and minesite exploration and evaluation costs. The lowest cost gold miner can operate in the \$1,000/ounce area (Barrick Gold) and other higher cost operators (New Gold) operate in the \$1,500/ounce range. This variance is largely due to by-product credits (Barrick's mines contain copper as well as gold). Simply put, if gold prices fall below \$1,500/ounce, New Gold would stop mining gold because it would be losing money. Rise Gold has not published its expectations for AISC. I think this information is pertinent because that metric would inform Grass Valley and Nevada City citizens and the potential employees of Rise Gold when the mine can be expected to operate.

Ind 579-3

Rise Gold has not published a feasibility study for the Idaho-Maryland mine. The goal of a feasibility study is to demonstrate the project is economically viable if it is designed, constructed and operated in accordance with the concepts set forth in the study. The feasibility study will define the Ore Reserves, the mining methods, the mineral processing concepts, and the scale of the project. To my knowledge, Rise Gold has commented on the mining methods, mineral processing concepts, and some aspects of the scale (1,000 tons/day). Every other gold miner I covered performed a feasibility study in order to convince investors the investment in a new project was a good one. The process can take up to 7 years. The fact Rise Gold has not performed a feasibility study is concerning not only for potential investors but also the community does not know if the mine can operate profitably. If Rise is promising 300 jobs once the mine is fully operational, we do not know the time frame of the mine opening, the time to full production, nor do we know how long the mine can operate. Every gold miner publishes in its 10-K and Annual Report its Reserves and Resources. Those numbers provide the mine life to investors (the calculation is simply Reserves/Annual Production). The fact Idaho-Maryland operated from 1866-1955 would suggest the Reserves and/or the Resources might be minimal. This should be disclosed to everybody. Here, I note that the Reserves and Resources change every year with the price of gold. Some gold reserves at different mines are more costly to extract than others; therefore, a gold miner has to annually adjust its Reserves and Resources.

Ind 579-4

Aside from the lack of AISC, the lack of Reserves, and the lack of a total project cost, which makes Rise Gold a poor investment, Rise Gold has a complete lack of capital for a full scale mine. Rise Gold stated it would pay 300 people an average of \$90,000/year during full production. Those would be



Ind 579-5

↑ nice jobs to have in Nevada County, but how can Rise Gold pay those people \$27 million/year when its market capitalization is \$15.8 million? Rise's most recent equity financing totaled \$2.4 million. I do not know what that Use of Proceeds are, but this financing as well as recent other investments in Rise Gold amount to kicking the can down the road. Due to Rise Gold's poor capital position, I would question the Company as a going concern and its ability to fund the operations.

On the ESG front, I do not see how one could invest in Rise Gold. On an environmental basis, it is impossible for the environment to benefit with a gold mine operating in the populated area. There are too many operational risks that could occur even for an experienced miner, let alone the CEO of Rise Gold. Local high paying jobs is the only social benefit. On governance, the CEO appears to be untrustworthy based on his previous experiences with trying to mine gold in other parts of North America. The CEO is the only employee of the Company according to Rise Gold's 10-K, so he has no checks and balances. He has little expertise on operating a mine which does not bode well for the likely failure of mining operations in an area where catastrophe could occur and create unwanted or unexpected fallout.

Ind 579-6

In sum, Rise's inability to produce basic gold mining fundamental operating costs, reserves, and project cost forecasts should limit its ability to produce from Idaho-Maryland forever. If history is any guide, gold prices will remain volatile, and Rise Gold will over promise and under deliver. It would be a disgrace to allow Rise Gold the opportunity to mine anything from Nevada Country over 5 years, let alone 80 years.

Sincerely,  
Mike Frey

Idaho.mmeir@co.nevada.ca.us



## **INDIVIDUAL LETTER 579: MICHAEL FREY**

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### **Response to Comment Ind 579-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

### **Response to Comment Ind 579-2**

The comment does not address the adequacy of the DEIR. The financial concerns of the comment are outside the scope of CEQA. Please see Master Responses 1 and 2.

### **Response to Comment Ind 579-3**

The comment does not address the adequacy of the DEIR. The financial concerns of the comment are outside the scope of CEQA. Please see Master Responses 1 and 2. The commenter also states that the reserves and resources within the project area might be minimal; however, no evidence is provided to substantiate this speculative claim. As stated in CEQA Guidelines Section 15384, “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.” Since 2018, Rise has been conducting exploration drilling to characterize underground resources in anticipation of future mining. Earlier exploration drilling as part of the former Emgold application has confirmed presence of gold resources.<sup>3</sup>

### **Response to Comment Ind 579-4**

The comment does not address the adequacy of the DEIR. The financial concerns of the comment are outside the scope of CEQA. Please see Master Responses 1 and 2.

### **Response to Comment Ind 579-5**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3.

### **Response to Comment Ind 579-6**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

---

<sup>3</sup> See Amec Foster Wheeler. *Technical Report on the Idaho-Maryland Project*. June 1, 2017.





**Individual Letter 580**

**From:** Michael Habeeb <mlhabeeb338@gmail.com>  
**Sent:** Monday, April 4, 2022 4:32 PM  
**To:** Idaho MMEIR  
**Subject:** Idaho Maryland Mine DEIR Comment Letter

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April 4, 2022

Matt Kelley, Senior Planner

(Sent electronically to [Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us))

Nevada County Planning Department

950 Maidu Avenue, Suite 170

Nevada City, CA 95959-8617

Subject: Idaho-Maryland Mine Project Draft EIR (SCH # 2020070378)

Dear Mr. Kelley,

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (Draft EIR) for the proposed Idaho-Maryland Mine Project (proposed project). The proposed project would reinstate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year permit period with gold mineralization processing and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations. The operations of the proposed project would allow for unmitigable impacts on our community for 80 years resulting in significant and unavoidable environmental impacts as well as damage the character and vitality of the community.

**Ind 580-1**

**Significant and Unavoidable Impacts**

The Draft EIR has determined that the following project impacts would remain significant and unavoidable, even after implementation of the feasible mitigation measures:

- Aesthetics

The Draft EIR determined that the proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The Draft EIR also determined that the project's incremental contribution to the significant cumulative impact related to substantial degradation of visual character or quality would be cumulatively considerable and significant and unavoidable.

**Ind 580-2**

- Noise





Ind 580-2

The Draft EIR determined that during construction activities, the project could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity (i.e., residents along East Bennett Road during construction of the potable water line). Even with implementation of mitigation, the impact would remain significant and unavoidable.

- Transportation and Circulation

The draft EIR determined that the proposed project would result in a significant impact at three study intersections under the EPAP Plus Project scenarios, one of which would be significant and unavoidable even after mitigation (Brunswick Road/SR 174). The Draft EIR also determined that the proposed project would have a cumulatively considerable incremental contribution to two intersections under both Cumulative Plus Project scenarios, one of which would be significant and unavoidable Draft EIR Idaho-Maryland Mine Project December 2021 Chapter 6 – Alternatives Analysis Page 6-8 even after mitigation (Brunswick Road/SR 174). In addition, the project's incremental traffic would cause a significant impact at one intersection queue during both Cumulative Plus Project scenarios (Brunswick Road/Sutton Way). Mitigation measures are identified and required for the aforementioned cumulative impacts, but it cannot be guaranteed that the measures would reduce the incremental impacts to a less than cumulatively considerable level.

**Preference of the No-Build Alternative**

Preference of the Environmentally Superior Alternative, which is Alternative 1: No Project (No-Build) Alternative. The No-Build ensures that the project area and the public would not result in project related impacts in the following CEQA Appendix G sections:

- Aesthetics
  - The proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The proposed project would result in tailings, the reduction of vegetative cover, the erection of industrial use buildings, mining equipment, engineered fill, and frequent trucks to transport materials. The No-Build would not impact the visual character or quality of the site and its surroundings.
- Air Quality
  - The proposed project would result in more truck traffic to the project area resulting in more air quality emissions, which may affect the health of the community even with the implementation of mitigation measures. The No-Build would not disturb naturally occurring asbestos as could possibly occur during underground mining.
- Biological Resources
  - The No-Build would not have the potential to impact special-status plants, foothill yellow-legged frog, western pond turtle, California red-legged frog, California black rail, coast horned lizard, special-status bats, and non-special status raptors and migratory birds. In addition, the Alternative would not result in any substantial adverse effects on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on federal or State protected aquatic resources.
- Cultural Resources
  - The No-Build would not substantial adverse effect would not occur to the underground mine workings, which were determined to be historically significant pursuant to the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR). The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.
- Energy
  - The No-Build would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The No-Build would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.
- Geology/Soils

Ind 580-3



- The No-Build would not include underground mining and generation of engineered fill, grading or other ground-disturbing activities, substantial soil erosion would not occur. In addition, the near-surface geotechnical features identified for closure due to dewatering of the mine would not be adversely impacted, though they may currently pose some level of risk that would continue under the Alternative. Other geotechnical issues that could pose a significant effect under the proposed project, but would not pose an adverse effect under the Alternative, include potential seismic hazards at the Brunswick Industrial Site and slope stability associated with temporary steep cut slopes at the new service shaft collar. However, the proposed project would fix a few existing geotechnical issues that would remain under this Alternative, including the safety concern related to the presence of the South Idaho Shaft on the Centennial Industrial Site, and an unstable portion of the clay-lined pond dam on the Brunswick Industrial Site.
- Greenhouse Gas Emissions
  - The No-Build would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
- Hazards & Hazardous Materials
  - The proposed project could result in a significant impact related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, specifically, the transport and underground storage and use of explosives at the Brunswick Industrial Site. Compliance with applicable federal (MSHA, OSHA), State (CCR), and local regulations, and the additional mitigation measures in the Draft EIR, would reduce the significant hazard related to transport, underground storage and use of explosives to a less-than-significant level. Because the use of explosives would be eliminated under the No-Build, the significant impact would also be eliminated. The Draft EIR determined that the proposed project could result in a significant impact related to creating a significant hazard through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment related to the Brunswick Industrial Site, given the presence of elevated arsenic in the southeastern paved area, potential residual petroleum contamination in a few locations, and presence of groundwater monitoring wells of unknown status. The No-Build would result in fewer
    - impacts related to hazards and hazardous materials.
- Hydrology/Water Quality
  - The No-Build would not result in on-site construction disturbance or above-ground operations such that the following project-related significant impacts to water quality would not occur: Centennial Industrial Site: engineered fill pad construction; Brunswick Industrial Site: operations within industrial area, underground placement of Cement Paste Backfill, use of clay-lined pond for water treatment process purposes, engineered fill pad construction, and treated water discharge in South Fork Wolf Creek. In addition, the No-Build would not necessitate dewatering of the mine; thus, there would not be a substantial reduction in groundwater supplies resulting in effects to nearby wells, though the proposed project includes mitigation to offset impacts to wells (i.e., provision of potable water service). Further, due to the lack of on-site operations, the No-Build would not result in the substantial alteration of drainage patterns, and for the Centennial Industrial Site, risk release of pollutants in a flood hazard area.
- Noise
  - The No-Build would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity, nor a substantial permanent increase in ambient noise levels in the vicinity of the project due to haul truck traffic. In addition, the Draft EIR concludes that the combined operational noise sources at the Brunswick Industrial Site could result in a significant noise impact. With respect to vibration, the Draft EIR determined that while blasting is not projected to exceed applicable thresholds, a ground vibration monitoring program should be implemented to determine the actual levels of ground vibration at commencement of mining. These operational noise and vibration impacts would not occur under the No-Build.
- Tribal Cultural Resources





- The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.
- Transportation
  - The No-Build would not generate construction traffic or operational vehicle traffic on local roadways and, thus, unlike the proposed project, the Alternative would not result in a significant construction traffic impact, nor would General Plan LOS policy conflicts occur under the EPAP Plus Project conditions to the intersections of Brunswick Road/Idaho Maryland Road, Brunswick Road/SR 174, and Idaho Maryland Road/Centennial Drive; and under the Cumulative Plus Project scenarios to the intersections of Brunswick Road/SR 174 and Sutton Way/Dorsey Drive. The proposed project would also result in a significant effect to the intersection queue during the Cumulative Plus Project scenarios (Brunswick Road/Sutton Way), which would not occur under this Alternative. Further, the Draft EIR determined that proposed project (Brunswick Industrial Site operations) would have an impact related to truck turn movements at the Millsite Road/E. Bennett Road project egress at the Brunswick Industrial Site; this effect would not occur under this Alternative. The Draft EIR determined that some of the above-noted impacts would be considered significant and unavoidable due to the uncertainty concerning certain mitigation measures. The subject impacts are the EPAP Plus Project and Cumulative Plus Project intersection impacts to Brunswick Road/SR 174 and the Cumulative Plus Project intersection queue at Brunswick Road/Sutton Way. These significant and unavoidable impacts would be eliminated under this Alternative.
- Wildfire
  - The No-Build would not result in a significant impact related to exacerbating wildfire hazards, as compared to the proposed project. For example, above-ground machinery would not be operated at both project sites. Therefore, potential vegetation fires associated with on-site equipment operations would be substantially reduced under the No-Build.

#### Beyond the Scope of CEQA

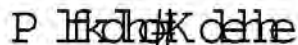
CEQA can be narrow in scope and does not address various issues such as social or economic issues.

The Draft EIR notes relevant caselaw on how impacts on private views are not studied under CEQA. Although this is true and accurate under CEQA, the property owners for those that would be impacted by the next 80 years of constant operation and construction would surely face a reduction in property value. Overall, the operations of the mine may act as a deterrent for the community and reduce the overall appeal of tourism as well as the demand for property within the area.

California droughts are affecting the entire state and the dewatering of our ground water supplies are going to exacerbate the issue. The area is highly prone to wildfire and the existence of the proposed project will exacerbate the wildfire risk within the project area which would affect the community at large. The permit period of 80 years is far too long, that is longer than most individuals may live and could have devastating effects on the community that would go unchecked for 80 years. The jobs the proposed project may bring into the area do not offset the potential impacts to the community and the environment. This is a quaint and appealing town, please do not decimate the positive aspects of this town for big business.

Thank you for the opportunity to review and comment on the Draft EIR. If you have any questions or would like clarification, please contact me here, [mlhabeeb338@gmail.com](mailto:mlhabeeb338@gmail.com).

Sincerely,



Michael Habeeb

Ind 580-4



## **INDIVIDUAL LETTER 580: MICHAEL HABEEB**

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### **Response to Comment Ind 580-1**

The comment does not directly address the adequacy of the DEIR. The commenter states that the DEIR identifies impacts that are considered significant and unavoidable.

The DEIR states that, before approving a project, the lead agency shall certify that the Final EIR has been completed in compliance with CEQA, and that the Final EIR has been presented to the decision-making body of the lead agency, which has reviewed and considered the EIR. (DEIR, p. 1-9.) The lead agency shall also certify that the Final EIR reflects the lead agency's independent judgment and analysis. (*Ibid.*) The findings prepared by the lead agency must be based on substantial evidence in the administrative record and must include an explanation that bridges the gap between evidence in the record and the conclusions required by CEQA. (*Ibid.*) If the decision-making body elects to proceed with a project that would have significant unavoidable impacts, then a Statement of Overriding Considerations explaining the decision to balance the benefits of the project against unavoidable environmental impacts must also be adopted. (*Ibid.*)

### **Response to Comment Ind 580-2**

The comment restates content from the DEIR and does not address its adequacy. No further response is required.

### **Response to Comment Ind 580-3**

The commenter indicates a preference for the No Project Alternative and does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 580-4**

The comment expresses property value concerns, which are outside the scope of CEQA. Please see Master Responses 1 and 2. The commenter also expresses concerns regarding drought and wildfire. Please see Master Response 6 – Wildfire Impacts and Master Response 16 – Drought and Climate Change. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 581**

**From:** Michael Leydon <mleydon@sbcglobal.net>  
**Sent:** Monday, April 4, 2022 4:00 PM  
**To:** Idaho MMEIR  
**Subject:** Comment Idaho-Maryland Mine DEIR

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RE: Idaho-Maryland Mine DEIR Deficient

The Idaho-Maryland Mine DEIR is deficient as it contains incomplete analysis of individuals whose wells will fail due to mine operations. As a proposed mitigation measure, persons whose wells fail will be forced to connect to and use NID water as their source of potable water.

**Ind 581-1**

According to the NID Annual Water Quality Report 2020, treated water delivered by NID contains both haloacetic acids and trihalomethanes. Both haloacetic acids and trihalomethanes are known and real carcinogens. To fully analyze impacts on persons whose wells fail due to Idaho-Maryland Mine operations, it is necessary to include the procedures and costs necessary to remove haloacetic acids and trihalomethanes from the water provided by NID to persons forced to use NID water. This analysis is required due to the exposure to carcinogens as a result of mine operations – an exposure to which they are not currently subjected.

**Ind 581-2**

According to the NID Annual Water Quality Report 2020, treated water delivered by NID also contains chlorine. Chlorine is emerging as a suspected carcinogen and is the subject of much research regarding its impact on health, particularly regarding its effects on those suffering from chronic respiratory disease (including asthma), those with food allergies, and other at-risk groups. Consequently, the Idaho-Maryland Mine DEIR must also identify those groups who may be negatively impacted by being forced to consume and use chlorinated water and the procedures and costs to remove chlorine from the water provided by NID to these groups.

**Ind 581-3**

According to the NID Annual Water Quality Report 2020, treated water delivered by NID contains numerous other substances all of which must be analyzed for their potential impacts to determine the necessity of removing such substances from the water to be delivered to those forced onto NID water usage as a result of Idaho-Maryland Mine operations. For those substances requiring removal, the DEIR must present an analysis of the procedures and costs to NID of attaining effective removal.





↑  
Thank You,  
Michael Leydon



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## **INDIVIDUAL LETTER 581: MICHAEL LEYDON**

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### **Response to Comment Ind 581-1**

Please see Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding the commenter’s treated water concerns, it is noted that drinking water supplied to Nevada Irrigation District (NID) customers continues to meet and exceed state and federal public health standards, based on testing results that serve as the basis for the District’s Water Quality Report.<sup>4</sup> As noted in the Water Quality Report, the reported haloacetic acids are below the maximum contaminant level, and therefore, no violation is reported. The same is true for trihalomethanes.

### **Response to Comment Ind 581-2**

The NID Annual Water Quality Report (Reporting Year 2021) indicates that reported chlorine levels are below the maximum contaminant level, and therefore, no violation is reported. Please also see Response to Comment Ind 581-1.

### **Response to Comment Ind 581-3**

As noted in Response to Comment Ind 581-1, drinking water supplied to Nevada Irrigation District (NID) customers continues to meet and exceed state and federal public health standards, based on testing results that serve as the basis for the District’s Water Quality Report.

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<sup>4</sup> See <https://www.nidwater.com/files/1e68c2c9b/NID+WQR+2021.pdf>.



**Individual Letter 582**

**From:** [Michael Malakian](#)  
**To:** [Planning](#)  
**Subject:** Comment  
**Date:** Wednesday, February 9, 2022 3:32:21 PM

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**Ind 582-1**

I read today that a few hundred postcards in support of the mine proposal went to the board today. I'm sure the board will realize that this is a massive minority view.

Just wanted to formally comment my opposition to this proposed renewed mine.

Thanks



**INDIVIDUAL LETTER 582: MICHAEL MALAKIAN**

---

**Response to Comment Ind 582-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1.



**Individual Letter 583**

**From:** [MICHAEL SHAW](#)  
**To:** [Matt Kelley](#), [bdofsupervisors](#)  
**Subject:** Opening the Mine  
**Date:** Monday, February 28, 2022 5:01:33 PM

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Dear Matt and Board of Supervisors,

I am writing to you about my concerns regarding the mine. I have read the draft of the Impact Report and find it to be deceptive in so many areas that I could write a book about it. I will only address one issue in this email though, ground water.

**Ind 583-1**

Removal of the water from the mine, or "dewatering" as it is casually refers to it as being. The models used are incorrect according to hydrologists that are not paid for by the mine. Per hydrologists with no skin in the game, the report is not accurate and assumes a lot that is not proven. For one thing the source of the water on Banner Mountain and the surrounding areas for miles in all directions, comes from Mount Lassen. Tests prove that this is a fact. Another fact about this is that it takes

**Ind 583-2**

the water about 40 years to arrive here from Mount Lassen. Removing the water from the mine will not only remove the water in the mine but it will eventually remove the water in every well above the level of the pumps, with the higher elevations of course, being the first to lose water. Not only will the wells dry up but so will the ground. The removal of the water will also remove the hydraulic

**Ind 583-3**

pressure the water creates in the groundwater. The hydraulic pressure is what drives the water through the billions of small openings allowing it to spread throughout the area. Wells drying up is only part of the problem. The forests will suffer as well.

**Ind 583-4**

What about the residents? Where will our water come from? There is no other water service in our area. There are numerous homes with no access to NID water currently. Who will install the water infrastructure to these homes and who will be forced to pay for it? How long would that take and when would it begin? What would we do for water in the mean time? Is NID going to pay for the installation and absorb the costs? I doubt this very much. More likely it could cost each resident tens of thousands of dollars to have water mains and service to their homes

**In 583-5**

installed. We don't have that sort of money to spend on water. Our property values would drop to zero. We could not sell our home for market value if we wanted to move away. Fire insurance which is already much too high would be even more unaffordable if it was even available. And who knows what else could be in the nasty details of this bad prospect as a result.





I urge you to please say no to this fraudulent scheme.

Thank you for taking a moment to read my email.

Sincerely,  
Michael Shaw  
11168 juniper Dr.  
Nevada City, CA 95959



---

## **INDIVIDUAL LETTER 583: MICHAEL SHAW**

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### **Response to Comment Ind 583-1**

The commenter states that the DEIR is inadequate with regard to groundwater impacts because independent hydrologists that the DEIR is inaccurate. However, the County's independent consultant, West Yost, peer reviewed the DEIR's Groundwater Hydrology and Water Quality Analysis and Groundwater Model Reports for the project. (DEIR, p. 4.8-40; Appx. K.7.) The commenter is also referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 583-2**

The commenter states that the dewatering of the mine will result in adverse impacts to groundwater supplies. The DEIR found that impacts to groundwater supplies would be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 583-3**

The DEIR found that impacts to groundwater supplies would be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 583-4**

The DEIR found that impacts to groundwater supplies would be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 33 – Groundwater Dependent Vegetation.

### **Response to Comment Ind 583-5**

The commenter is concerned that the project's potential impacts to groundwater supplies would have an adverse effect on property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.



**Individual Letter 584**

**From:** MICHAEL SHAW <ten9t7mike@aol.com>  
**Sent:** Monday, April 4, 2022 1:50 PM  
**To:** Idaho MMEIR  
**Subject:** Negative Impact Vote

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

**Do not click links or open attachments unless** you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Hello, I have written to the supervisors and planning commission on numerous occasions expressing my opposition to this proposal. I have read the Draft EIR and I have read the comments by those in favor of the mine. What I have not read, however, is where the people that are in favor of the mine reside. It is my bet that they live in areas that are not negatively impacted by the mine's operations. They do not have a well that will be effected, nor will they be in an area of the constant noise, or have to feel the rumbling and blasting day and night, or breathe the air that will have cancer causing pollution blowing for miles around, or deal with the trucks and diesel fumes. In fact, I would bet they live where nothing changes for them, and they only see the promised benefits that is Rise Grass Valley is telling will be the payoff.

**Ind 584-1**

I am happy that this is an issue that an important board of informed and reasonable people will decide on. If it were to be put to a vote of the public, where most likely, many of the non impacted people live, they would likely vote to pass this measure. And why not? If it goes wrong, who cares? What can go wrong?

Thank you for taking a moment to read this.

Sincerely,

Michael Shaw  
11168 Juniper Dr.  
Nevada City, CA 95959



## **INDIVIDUAL LETTER 584: MICHAEL SHAW**

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### **Response to Comment Ind 584-1**

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.



Individual Letter 585

Certified Number 7021 0350 0002 0513 5112  
Return Receipt Requested

March 23, 2022

Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Ave Ste 170  
Nevada City CA 95959-7902



Ind 585-1

This contains my comments on some of the inadequacies present in the Draft Environmental Impact Report. And while I appreciate the extra time you allowed, I did not have time to review the entire 1070-page document, appendixes, technical reports, plans, etc., that took the Raney Planning and Management firm nearly two years to review and prepare.

**Noise**

Ind 585-2

I take strong issue with the findings of the Noise and Vibration Study. The study's predictions shown for my home are impossible to believe. Noise and Vibration Study Figure 3 shows my house as number 28. For my location, Table 6 lists the baseline ambient daytime noise at 51 db and nighttime noise at 44 db, which according to Figure 2, is the sound of a refrigerator hum or electrical transformer. I've lived at this location for 13 years and, based on my experience, know that both of these figures are overstated. Although I cannot afford a sound study to prove my point, please consider the following:

Ind 585-3

According to the Noise and Vibration Study, the **engineered fill operation** will take place 500' behind my house. Currently, there is just a forest back there with no mechanical or other human noise-producing activity of any kind. Yet Table 17 predicts the fill operation will only be 47 db at my location – less than what the study says is the current ambient daytime noise (51db). This means that 50-100 runs by diesel haul trucks dumping rock out of steel bed trailers, then being graded and compacted by heavy earthmoving equipment emitting backup beeps, will be quieter than no activity at all. **This makes no logical sense.**

Ind 585-4

According to the Noise and Vibration Study, mineral processing will take place 2,000' from my house. Table 22 has the predicted cumulative noise from all nighttime mine operations as being 26 db at my location. This means the study predicts that hoisting 1000 tons of soil and rock 85' above the surface and dropping it into a steel chute, then transporting it 335' on a conveyor and grinding it down, will be quieter than no activity at all (44 db). It predicts that at my house, all this activity, running 24 hours a day, will be quieter than rustling leaves. **I fail to see how any logical person could come to this conclusion and believe this demonstrates the inadequacy of the sound study.**





**Ind 585-5** In my August 11, 2020 letter I asked that the county ensure the Draft Environmental Impact Report addressed how such a situation could exist. It did not. The draft EIR is incomplete because it does not explain how a mine operating 24 hours a day can possibly be quieter than having no mine at all.

**Air Quality**

**Ind 585-6** In my August 11, 2020, scoping letter I asked "What contaminants will be in the air exhausted from the mine shaft; where will the wind carry them; and where will the contaminants come down? What impact on the environment will these contaminants have during the 80 years the mine is expected to be open?" **My questions were not answered in the draft EIR.**

**Ind 585-7** I see that in the draft EIR, toxic air contaminants [TACs] are addressed under the section on air quality and greenhouse gas emissions. The direction of prevailing winds and pollutant concentrations from a wildfire are discussed and we are told the TAC emissions associated with blasting and crushing would include asbestos and silica emitted from the fugitive dust produced and would also result in emissions of heavy metal TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium. Appendix E.1 says, "These emissions could result in elevated concentrations of TAC emissions at nearby receptors, which could lead to an increase in the risk of cancer or other health impacts." However, the applicant's "Proposed Emissions Reduction Measures" only discusses vehicle exhaust emissions and surface fugitive dust control. It does not address TAC emissions from the air exhausted from the mine. I do not see any mention of where the prevailing winds will carry the asbestos, silica, arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium released from the air exhausted from the mine or where these contaminants will come down. Although health impacts are discussed in Appendix E.1, after checking the draft EIR, Appendix E.1, and the Asbestos, Serpentine, and Ultramafic Rock (ASUR) Management Plan, I can find no mention or discussion of the effects of the exhausted contaminants over the 80-year life the mine is expected to be open.

The draft EIR is incomplete because it does not address where the wind will carry the contaminants **exhausted from the mine** (not from mine vehicles), where the contaminants will come down, and what impact on the human health and the environment these contaminants will have during the 80 years the mine is expected to be open. Nor does the draft tell us how far vehicle tires will carry contaminants that have been exhausted from the headframe and come down on roadways away from the mine site.

**Mineral Rights**

**Ind 585-8** The description of the mineral rights owned by Rise Grass Valley are too vague to be of any value: "The much larger mineral rights boundary encompasses **approximately** 2,585 acres and **generally** contains properties surrounding the Brunswick and Centennial Industrial Sites, with the **majority** of additional land area located north of the Brunswick Industrial Site and east of the Centennial Industrial Site. This **generally** includes most of the Nevada County Airport and



surrounding Air Park, as well as property along both sides of Brunswick Road, Greenhorn Road, and Idaho Maryland Road [emphasis added]."

The map provided in the draft EIR Figure 3-2 outlining the mineral rights areas, does not provide enough information to determine whether an individual's property lies within the mineral rights boundary. Only a few major roadways are identified.

**A more detailed map, showing street names along the mineral rights boundary is needed. A more complete description of the mine's mineral rights area also is needed. Such a description should list the parcel IDs of the properties the mineral rights are under.**

The map provided in the draft EIR Figure 3-2, Project Location Map, identifies two detail maps – 3b and 3c, however nowhere in the draft EIR are maps identified as detail 3b and 3c available. **These two detail maps need to be included.**

#### Emergency Evacuations

DEIR Section 4.7-4 states that the mine's impact would be less than significant with an adopted emergency response plan or emergency evacuation plan.

The analysis contained in Section 4.7-4 of the mine's effect on emergency evacuations is **incomplete as it only discusses the impact haul trucks would have on evacuations.** The section **does not** examine the effect the evacuation of **mine employees** would have on the emergency evacuation of area residents. The draft EIR, Table 3.8, "Operations Workforce" shows there will be 111 employees per shift, thus there will be many vehicles - up to an additional 111 - exiting on Brunswick Road during an emergency evacuation. The draft EIR points out that, "According to Table 4.1 of the Circulation Element of the General Plan, Brunswick Road is considered a Minor Arterial, and thus, is not a primary evacuation route for the County." (Note that Brunswick Road will be the major road for trucks and other mine-related vehicles to use.)

There may be no way to mitigate the mine adding up to 111 additional vehicles onto a minor arterial during an emergency evacuation. In addition, there is no mention of what action would be taken if an emergency evacuation took place while a truck carrying explosives was en route to the mine on Brunswick Road or was being unloaded at the mine site at the time of an evacuation. **These two omissions could change the impact under Section 4.7-4 to "significant" and need to be reviewed.**

#### Explosives

Draft EIR section 3.7 states that "Explosives would be transported to the Brunswick Industrial Site a maximum of once a week to a minimum of once every three weeks." Section 4.7-1 states "During operations, explosives would be transported to the Brunswick Industrial Site a maximum of once a week and a minimum of once every three weeks. **During initial underground construction, explosives may be transported to the site more frequently** [emphasis added]."

Ind 585-9

Ind 585-10

Ind 585-11





However, Section 4.7-1 also tells us, "The Hazardous Material Inventory Statement for Brunswick provides that a maximum of 28,000 pounds of explosives will be stored underground. Rise intends to use approximately 0.93 tons of explosives and approximately 257 detonators per day...."

By dividing the total pounds of stored explosives by the number of pounds used per day, it is apparent that the entire stock of explosives would be depleted in 15 days – 0.93 tons/2,000 pounds per ton=1,860 pounds used per day. 28,000/1,860=15 days. Thus, it is **not operationally feasible** that delivery of explosives would take place only once every three weeks.

As shown above, Sections 3.7 and 4.7-1 need to be recalculated to show an increase in explosives delivery to more accurately reflect that – at a minimum – explosives would have to be transported to the site every two weeks. **Since more frequent transportation and above-ground handling of explosives increases risk, it would be logical to assume that the level of significance would also change.**

Rise Grass Valley says they will use 257 detonators a day, however, there is no information on how many detonators or detonating cords will be stored in the explosives magazines or how often they will be transported through Grass Valley. Only ammonium nitrate is included in the 28,000 pounds of explosives shown on the "The Brunswick Industrial Site Nevada County Department of Environmental Health Hazardous Materials Inventory Statement Form" submitted by Rise Grass Valley. Draft EIR Table 4.7-1, "Explosives Proposed to be Used at Project" lists the following Detonators - Digishot, Driftshot, NONEL EZ, NONEL LP, i-kon, Exel, Handidet. However, none of these are listed on the Hazardous Materials Inventory Statement Form mentioned above. In addition, Table 4.7-1 lists hazard classes of 1.1b or 1.4b for the detonators. Since hazard class 1.1b includes "Explosives that have a mass explosion hazard" and 1.4b includes "Explosives that present a minor explosion hazard," **the draft EIR needs to provide the names of the actual detonators that will be used, their hazard class, the quantity of each type kept in the explosives magazines and the frequency of transportation.** Without this information, the draft EIR cannot be adequately evaluated.

Ind 585-12

#### Diesel Fuel Tanks

Table 3-5 of the Draft EIR maintains there will be two 12,000-gallon diesel fuel tanks at the Brunswick Site, yet both the initial Project Description (Tables 5 and 9) and the draft 3.0 Project Description (Tables 3-4 and 3-8) list one 30,000-gallon diesel fuel tank. **Which is it – two 12,000-gallon tanks or one 30,000-gallon tank?** Please provide the correct number and capacity of the diesel fuel storage at the Brunswick Site and reissue either the Draft EIR or Project Description with the correct information so it can adequately be reviewed.

Ind 585-13

#### Asbestos

Draft EIR section 4.3-2 Asbestos Dust Mitigation Plan does not address the following:

Ind 585-14



Ind 585-15

"All visible track-out material (from vehicles leaving the work site) must be removed from all public roads at least once per day using wet sweeping or a HEPA-filter-equipped vacuum device."

Since employee vehicles will exit on Brunswick Road, how will traffic on Brunswick Road be managed during the wet sweeping or vacuuming? How will traffic on East Bennet Road be managed? Will traffic be stopped during the operation? **None of this was considered in the traffic study.**

"A gravel pad designed and maintained to effectively clean tires of exiting vehicles, a wheel wash system, or a minimum of 50 feet of pavement must be placed between the construction area and any public road, and must be used by all exiting vehicles (including personal vehicles and delivery trucks) throughout the duration of the project."

Since the gravel pad or 50 feet of pavement are used to capture dust containing asbestos, it seems logical that the concentration of asbestos would be much greater in this area, yet there is no discussion of what happens to the asbestos dust captured in these areas during rainstorms or snow melts. **Where will the dust end up - will it wash into the south fork of Wolf Creek?**

"All active storage piles shall be adequately wetted or covered with plastic to ensure that no visible dust crosses the property boundary."

Ind 585-16

Since the piles of engineered fill will fall under this provision, this means **44 acres at the Centennial Site and 31 acres at the Brunswick Site would have to be kept adequately wetted around the clock or covered with an immense amount of plastic.** Yet Table 3.7, Hours of Operation only provides staffing for the Placement, grading, and compaction of engineered fill from 7:00 am to 3:30 pm Monday to Friday. There are no provisions for keeping the piles of fill adequately wetted outside of those hours. **Obviously, the wind does not stop blowing at 3:30 or on weekends.** Furthermore, the draft EIR section "Water Supply and Other Utilities" only provides water for compacting fill at the Centennial Site eight hours per day, five days per week. **If the Centennial fill piles need to be kept wetted after 3:30 pm or over a weekend, more water will be required. This has not been taken into consideration.**

#### Methane

Ind 585-17

There is a concern that the draft EIR incorrectly assessed the possibility of methane in the mine. The 1931 US Department of Commerce Bulletin 347, "Gasses that Occur in Metal Mines" tells us that methane is likely to be present: "In the Grass Valley (Calif.) gold-mining district, where carbonaceous shales are found in conjunction with or close to the gold-bearing measures, some rather extensive and troublesome accumulations of methane have been found." Yet the Air Quality and Greenhouse Gas Emissions Analysis Technical Report shows zero methane released from underground blasting/mining in Table 22. **It appears the author of the report assumed no methane is present in the mine. Bulletin 347 makes it clear more research is needed.**





#### Brunswick Site Native Resident Wildlife

This concerns draft EIR section 4.4, Biological Resources. According to the Brunswick Industrial Site and East Bennett Road Right of Way (ROW) Biological Resources Assessment (Brunswick BRA), the scope of the report was limited to evaluating the Brunswick and Centennial Areas for the presence of any sensitive biological resources including special-status plant and wildlife species. Out of the 133 pages in the report, only 185 words dealt with deer habitat on the Brunswick site and there was no discussion of any other native resident wildlife. As will be established below, **draft EIR section 4.4-4, which covers native resident wildlife rather than special status plants and animals, has an incorrect conclusion concerning the impact the mine will have on native wildlife at the Brunswick site.**

The biologist contracted by Rise GV says he "conducted reconnaissance-level wildlife surveys..." Based on these limited surveys and the "Migratory Deer Ranges Nevada County General Plan map," the biologist preparing the Biological Resources report stated, "The field surveys did not record any observations of deer. The Centennial Industrial Site and Brunswick Area do not contain any known major deer migration corridors, known deer holding areas, nor critical deer fawning areas." Because he did only a preliminary survey and did not observe any deer, he incorrectly concluded in draft EIR section 4.4-4, "Given the above, the proposed project would not interfere substantially with the movement of any wildlife and a less-than-significant impact would result."

Ind 585-18

Without observing any deer, the biologist decided that "The primary movement corridor within the Brunswick Industrial Site is South Fork Wolf Creek and its associated riparian zone." According to the two paragraphs devoted to Critical Deer Habitat in the Brunswick BRA, the biologists came to this decision by reviewing the Nevada County General Plan. The General Plan section on deer habitats was based on a 1991 California Department of Fish and Game study. A lot has changed at the Brunswick site since 1991 including the shutting down and removal of the Bohemia Sawmill which ran 24 hours a day. **The biologist was not hired to provide updated information concerning deer and other native wildlife and thus relied on 30-year-old information.**

Thirty-one acres of the 119-acre Brunswick site will be covered with engineered fill. To accommodate the fill, 18.7 acres of forested area will be clear cut. **This area is covered with game trails that the biologist chose not to investigate further or mention in his report.** I have lived next to the Brunswick site for 13 years and know that the site holds not only deer but contains other wildlife as well. To demonstrate this point, I purchased and placed a trail camera along obvious game trails (trails the biologist must have seen) in the site's forested and future fill areas from February 2021 through February 2022.

Exhibit A has screenshots from the trail camera, showing deer in different locations throughout the year and throughout the forest, including several of does and their fawns. I have many more examples of deer, some showing deer active at nighttime, but am limiting my exhibit to a





single page of daytime shots as it illustrates my point that the Brunswick site holds a year-round native deer population where doe give birth to their fawns.

Exhibit B shows that the forest is also home to many other species of animals that the biologist failed to mention or consider. These include, but are not limited to, black bears, mountain lions, bobcats, turkeys, opossums, and foxes. (Exhibit C shows the approximate locations where the trail camera was placed.) Exhibit B further shows that many of the animals inhabiting the Brunswick site are active at nighttime when it is dark and quiet. Yet even though the Brunswick site will create noise 24 hours a day and be illuminated by a total of 110 outdoor lights that will shine all night long, the biologist concluded, "...noise and nighttime lighting related to proposed operations would not be anticipated to result in adverse impacts to wildlife behavior." **Based on the many animals active at night this conclusion needs to be revisited.**

The Standards of Significance section of the draft EIR says, "a significant impact would occur if the proposed project would...Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." Exhibits A and B prove the operation of a mine and clear-cutting the forest would have a **significant effect** on established native resident wildlife. These pictures also demonstrate the limited scope of the biological study, which should put the entire study in question.



Michael Shea  
PO Box 927  
Cedar Ridge CA 95924

Attachments:

Exhibits A, B, C





## Exhibit A Deer inhabiting the Brunswick Site



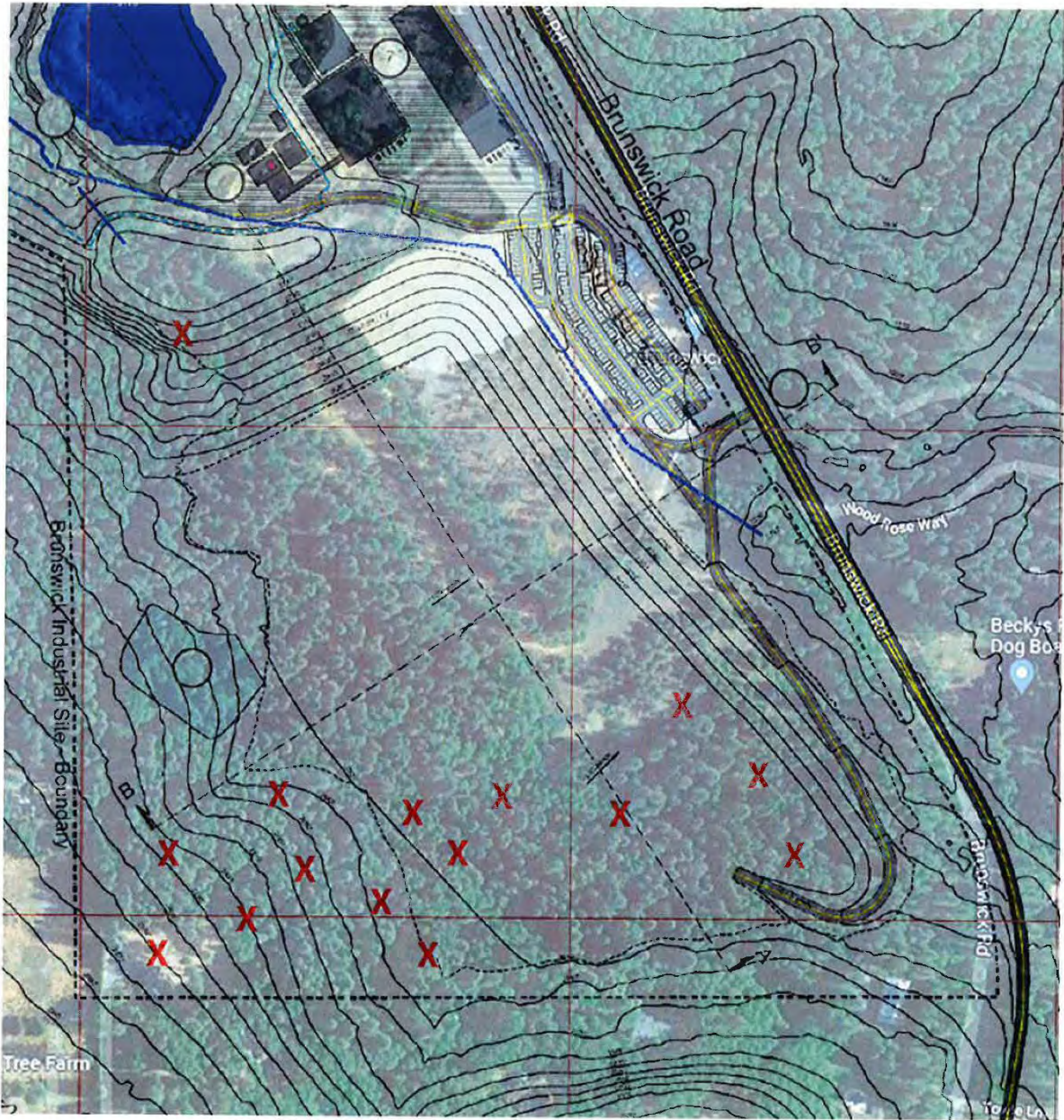


### Exhibit B Other Animals inhabiting the Brunswick Site





### Exhibit C Approximate Trail Camera Locations



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## **INDIVIDUAL LETTER 585: MICHAEL SHEA**

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### **Response to Comment Ind 585-1**

This comment states that the DEIR is inadequate and the review period was not long enough for review. Responses to specific comments are provided below. CEQA requires a minimum 45-day public review period for DEIRs submitted to the State Clearinghouse (PRC 21091). The County elected to provide an extended DEIR review period of 91 days from January 4, 2022, to April 4, 2022. Thus, this extended review period is substantially longer than typically provided for a public comment period.

### **Response to Comment Ind 585-2**

The commenter disagrees with the findings of the Noise Study. The level of 47 dBA predicted for this receptor (Receptor #28) during daytime engineered fill operations at the Brunswick site is the noise-generation of the engineered fill operations alone. (DEIR pp. 4.10-5; 4.10-18 and Table 4.10-6.) When added to the existing average ambient daytime noise level of 51 dB at this receptor, the existing plus project noise exposure at this receptor computes to 52.5 dBA, or an increase of 1.5 dBA over existing average ambient conditions at this receptor. (Id.) An increase of 1.5 dBA is not considered significant relative to the project's standards of significance. The noise analysis was not intended to imply that the project would result in an overall decrease in existing ambient noise levels at any sensitive receptors in the project vicinity. Rather, it was intended to imply that the noise generation of the project by itself would be below existing ambient noise levels experienced at the nearest residences.

The commenter states that earthmoving equipment would emit backup beeps. However, Mitigation Measure 4.10-1, requires that all mobile equipment shall be fitted with broad-band “growler” type back-up warning devices rather than the conventional “beeper” devices, which “growler” type devices are known to be much less annoying.

### **Response to Comment Ind 585-3**

Please see Response to Comment Ind 585-4 below.

### **Response to Comment Ind 585-4**

The predicted level of 26 dBA Leq at this receptor during nighttime hours reflects the fact that engineered fill operations would not occur during nighttime hours. During engineered fill operations at locations closest to this residential receptor, the difference between cumulative project daytime and nighttime noise levels is substantial (25 dBA difference in average levels). The predicted level of 26 dBA during nighttime hours reflects the noise attenuation provided by intervening distance to the processing area noise sources (2,000 feet), intervening vegetation, atmospheric absorption, any shielding of project noise sources by proposed buildings or topography, and ground cover. It should be noted that the predicted nighttime level of 26 dBA Leq at this receptor is the noise-generation of the project operations alone. When added to the existing average ambient nighttime level of 44 dBA at this receptor, the existing plus project nighttime noise exposure at this receptor would still be equivalent to baseline ambient conditions. The noise analysis was not intended to imply that the project would result in a decrease in existing ambient noise levels at any sensitive receptors in the project vicinity. Rather, it was intended to imply that the noise generation of the project by itself would be below existing ambient noise levels experienced at the nearest residences.





### **Response to Comment Ind 548-5**

The noise analysis was not intended to imply that the project would result in a decrease in existing ambient noise levels at any sensitive receptors in the project vicinity. Rather, it was intended to imply that the noise generation of the project by itself would be below existing ambient noise levels experienced at the nearest residences. Please see Response to Comment Ind 585-4.

### **Response to Comment Ind 585-6**

A detailed analysis of airborne contaminants, modelled concentrations at receptor locations, and resulting health risk is provided in Chapter 4.3 and Appendix E.2 of the DEIR. The analysis in the DEIR concluded that air quality impacts from the project would be less than significant after implementation of required mitigation measures. (see DEIR Chapter 4.3.)

### **Response to Comment Ind 585-7**

The commenter states that the DEIR does not explain what direction the project's air emissions, including toxic air contaminants, will be carried. The commenter also states that the DEIR does not address contaminants carried by vehicle tires and exhausted from the headframe.

The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the EIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HRA presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR. Several commenters identified not being able to see the risk of the HRA visually. Isopleth figures were developed in response to these comments, which show where the project's emissions would travel. Please see Dudek Memo – Isopleths attached to the Final EIR as Appendix K.

The commenter asserts that the ASUR plan does not show the effects of the project's emissions. However, the ASUR Plan is a management plan and discusses how rock will be managed (including sampling and testing) in the future during operations to minimize the public's exposure to asbestos and is not an impact analysis. The project's emissions, impacts and mitigation are analyzed in Chapter 4.3 of the DEIR. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP.

The commenter states that the DEIR is incomplete because it does not state how far vehicle tires will carry contaminants that have been exhausted from the headframe and come down on roadways away from the mine site. Notably, CEQA requires a good faith effort to estimate emissions from the project during construction and operation. As such, estimation of emissions during the construction and operation of the project are based on project-specific information and industry-standard emission factors and models. Mitigation Measure 4.3-2 requires that "All visible track-out material (from vehicles leaving the work site) must be removed from all public roads at least once per day using wet sweeping or a HEPA-filter-equipped vacuum device." Further, the project design incorporates mobile tire washing plants. As such, the DEIR includes project features designed to prevent track-out and also requires mitigation for any track-out impacts and



consequently found the related impact to be less than significant. (see DEIR, p. 4.3-82.) The HRA prepared for the project (see Appendix E.1 of the DEIR) accounted for toxic air contaminant emissions from the headframe based on the AERMOD dispersion model. Results of the health risk modeling are conservative and based on the best available data currently available, as described in Appendix E.1 of the DEIR:

The results determined in this analysis reflect reasonable estimates of source emissions and exhaust characteristics, available meteorological data near the project site, and the use of currently approved air quality models. Given the limits of available tools for such an analysis, the actual impacts may vary from the estimates in this assessment. However, the combined use of the AERMOD dispersion model and the health impact calculations required by OEHHA and NSAQMD tend to overpredict impacts, such that they produce conservative (i.e., health-protective) results. For this reason, the estimated cancer risks and noncancer hazard indices reported in this analysis are likely upper-bound estimates for potential exposure to project-related emissions. In addition, the estimated cancer risks and noncancer hazard indices represent the maximum exposed individual (resident) and do not represent the risk over a broad area. The actual risks of cancer or noncancer effects from the project are likely to be lower than presented herein.

### **Response to Comment Ind 585-8**

The commenter requests a map showing the individual parcels within the mineral rights area, but does not explain why this is necessary for the environmental analysis in the DEIR. Figure 3-2 of the DEIR shows the names of major roads and provides an air photo where most individual homes can be seen in relation to the mineral rights boundary.

Detail Maps 3b and 3c are shown in Figures 3-3 and 3-4 of the DEIR. Please also see Master Response 7 – Location of Future Mining Areas.

### **Response to Comment Ind 585-9**

The commenter states that the DEIR's analysis of impacts to emergency evacuations is inadequate because it does not account for employee trips. With regard to employee vehicles during an evacuation, please see Master Response 5 – Evacuation Zones.

### **Response to Comment Ind 585-10**

The commenter questions what would happen if a truck carrying or unloading explosives was involved in an evacuation. The project truck traffic accounts for only approximately 1% of typical traffic on Brunswick Road and would not affect an evacuation. Please see Master Response 5 – Evacuation Zones. Trucks used for transportation of explosives would be evacuated similarly to any other vehicle during an evacuation.

### **Response to Comment Ind 585-11**

The commenter asserts that the frequency of explosives deliveries discussed in the DEIR is not accurate, and therefore the significance conclusion should be changed. As stated in the DEIR, explosives deliveries would take place from 1 to 3 weeks. (DEIR, p. 4-7.24.) The average of 2 weeks (15 days as calculated by the commenter) is implied from this range. As discussed on pages 14 and 15 of Appendix M of the DEIR, tunneling (drift) blasts would take place daily but production longhole blasting would take place once every 3-4 days. At certain times explosives may be consumed immediately upon delivery underground when loading larger production longhole blasts. Therefore, explosives consumption is not uniform over every day. As discussed in Chapter 4.7 of the DEIR, the transportation of explosives in the United States is highly regulated and has an excellent safety record. The analysis of explosives transport in Chapter 4.7 of the DEIR does not depend on the precise frequency of explosives delivery to determine the



significance of hazards. Therefore, an increase in frequency would have no effect on the DEIR's conclusion that a less than significant impact would result from explosives transport, storage, and use, after implementation of mitigation.

### **Response to Comment Ind 585-12**

The commenter asserts that the names of the actual detonators to be used, the hazard class and quality of each type of detonator, along with frequency of transportation must be disclosed in the DEIR. The analysis of explosives transport in Chapter 4.7 of the DEIR does not use the frequency of explosives delivery to determine the significance of hazards. As shown in Table 4.7-1 of the DEIR, the detonators used may be classified as either 1.1B or 1.4B but both are in Compatibility Group B, meaning they may be transported and stored together. The ratio of types of detonators would not result in any change to the conclusion of the DEIR and therefore specific details on brands and types of similar detonators, are not necessary or required for the DEIR. Engineering level detail, such as actual brands of detonators or the exact ratio of types, is not required in an EIR. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26.)

### **Response to Comment Ind 585-13**

The commenter requests clarification regarding the DEIR's statements on a 30,000-gallon diesel tank, and other references to two 12,000-gallon diesel tanks. As stated in the DEIR (Table 3-5, Table 3-9, Table 3-10), the project proposes two 12,000-gallon tanks for storage of diesel. Chapter 3.0 of the DEIR is the project description. It is noted that page 1-14 of the DEIR references a 30,000-gallon diesel tank because this section summarizes comments from the public during the NOP scoping process, at which time a single 30,000-gallon tank was proposed; thus, there is no error or contradiction.

### **Response to Comment Ind 585-14**

The commenter asks how traffic will be managed during wet sweeping or vacuuming activities that are required to control dust. As shown in Table 3-9 of the DEIR, mobile tire washing plants are proposed to be used to wash truck tires of vehicles leaving non-paved areas where engineered fill would be placed. As shown in Figure 3-8 of the DEIR, all roads outside of the engineered fill piles are proposed to be paved. Therefore, vehicle tires will not require washing as they leave the Brunswick site onto public roads and would not leave visible track-out material on public roads. If necessary, the onsite paved roads could be cleaned to ensure employee and other vehicles do not track dust onto public roads. Mitigation Measure 4.3-2 requires an Asbestos Dust Mitigation Plan and the minimum requirements of the Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations are provided in the mitigation measure, which include the removal of visible track-out material. While the project by design is intended to prevent such track out material from occurring in the first place, any necessary wet sweeping or vacuuming activities would be accomplished during off-peak traffic hours and would only take several minutes to accomplish; therefore, no traffic impact from such cleaning would occur. As shown in Response to Comment Ind 648-4, Mitigation Measure 4.3-2, on page 4.3-83 of the DEIR, has been clarified to require that any necessary wet sweeping or vacuuming activities on public roads will be conducted so as to avoid peak AM and PM traffic hours.

### **Response to Comment Ind 585-15**

The commenter asserts that high concentrations of asbestos will result in the gravel pad or pavement areas used to clean exiting vehicle tires, and asks where the associated dust will go. Mitigation Measure 4.3-2 provides several options based on Section e(4)(A)(2) Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations. The project proposes



mobile tire washing plants to be used to wash truck tires of vehicles leaving non-paved areas where engineered fill would be placed and not rely on gravel pads or 50 feet of pavement to capture dust. Any sediment from tire washing would be captured onsite by the washing plant and disposed of onsite alongside the engineered fill being placed. It would not be washed into South Fork Wolf Creek or other waterbodies. As shown in Response to Comment Ind 648-4, Mitigation Measure 4.3-2 has been edited to add the word “or” in bullet point 3 to clarify that a gravel pad is not required if a wheel wash system is employed.

### **Response to Comment Ind 585-16**

The commenter asserts that the DEIR does not account for the hours of operation and water demand necessary for wetting of active storage piles, as required under Mitigation Measure 4.3-2, with respect to the engineered fill piles. However, the engineered fill piles are not considered active storage piles for the purposes of Mitigation Measure 4.3-2, because the compacted surface of the engineered fill is much more resistant to wind erosion than a loose storage pile from typical construction. Dust is generated from active disturbance (such as digging and dumping) of storage piles, while engineered fill surfaces that are not actively worked have no such disturbance and consequently are not an active source of dust emissions. Once material is placed and compacted it would not be removed again. Side slopes would be vegetated concurrently with construction and the surface would be vegetated after reaching final grade. Constant wetting of the entire site or covering of large areas with plastic is not proposed. As stated in Mitigation Measure 4.3-2, more practical and effective options, such as application of chemical stabilizers are available to control dust of inactive surface areas, if necessary (see Master Response 12 - Chemical Dust Stabilizers). Nevertheless, pursuant to Mitigation Measure 4.3-2 and the minimum requirements of the Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations, the project must ensure that visible dust does not cross the boundary of the property and that the project is in compliance with the approved Asbestos Dust Mitigation Plan and would be required to take whatever necessary measures to ensure compliance.

### **Response to Comment Ind 585-17**

The commenter asserts that the DEIR should consider impacts from methane in the mine and provides a historic document that states methane is associated with shale in the Grass Valley gold mining district. However, there is very little sedimentary rock or shale in located in the area of the Idaho-Maryland Mine (see Sheet 4 of Appendix K.2). Any mine gases that occurred underground would be heavily diluted by modern mine ventilation flows, which is much greater than those used in 1931. Furthermore, the US Mine Safety and Health Administration regulates the safety in underground mines and regulations include CRF 30 Part 57 Subpart T - Safety Standards for methane in Metal and Non-metal Mines. Methane from the underground mine therefore poses no risk to either the mine or the public.

### **Response to Comment Ind 585-18**

The CEQA guidelines require analysis of substantial interference to "the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." Migration is defined as the seasonal movement of animals from one habitat to another. Various animal, bird, and fish species are not automatically considered migratory just because they move from one location to another. Migration serves a purpose for the species such as winter/summer habitat for foraging or breeding. It is acknowledged and analyzed in the DEIR impact analysis (see section 4.4.4) that species exist within the project site that are common to the area. Potential impacts to these species were analyzed and mitigation measures have been provided where it was determined



impacts to species could occur as a result of project activities, including the implementation of preconstruction surveys and agency permitting requirements. The only migratory species acknowledged by the County General Plan is deer migration corridors. Per the Migratory Deer Ranges Nevada County General Plan map, the project site is located in an area of potential Deer Winter Range. The project site does not contain any known major deer migration corridors, known deer holding areas, nor critical deer fawning areas. Any deer within or adjacent to the project site would move outside the project site and would be uninhibited to move into and out of the project site and the areas outside the project site. Thus, substantial interference, which is the operative language in Appendix G of the CEQA Guidelines, would not occur to deer movement. Impact 4.4-4 addressed the project's impact to this potential migratory corridor and concluded it would be less than significant.





**Individual Letter 586**

**From:** Michael Way <way\_michael@protonmail.com>  
**Sent:** Monday, April 4, 2022 9:40 AM  
**To:** Idaho MMEIR  
**Subject:** Please Don't Reopen The Mine

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**Do not click links or open attachments unless** you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Hello,

I hope this message finds you well.

Our biggest concern is the de-watering of the mine.

We live at the top of the banner and our well is 400 feet deep and is barely good enough to keep up with our household needs. There are lots of dry wells in our neighborhood and there is no other place on our property to drill a well. Our most recent verbal quote from NID is somewhere in the range of \$50k, which would only get us a meter on banner lava cap. We would still need to pipe across several properties and install an intermediate tank on someone else's property.

Perhaps the risk would be justified if the mine was going to extract a mineral that is critical to our future, like lithium, nickel or cobalt.

Please let me know if you have any questions.

Thanks,  
Mike

12614 Short Circle  
Nevada City, CA 95959  
530.305.6559

Sent with [ProtonMail](#) secure email.

Ind 586-1



## **INDIVIDUAL LETTER 586: MICHAEL WAY**

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### **Response to Comment Ind 586-1**

The commenter expresses concern regarding dewatering of the mine and impacts to wells. Please Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 587**

**From:** Michelene Bowman <michemiche30@icloud.com>  
**Sent:** Sunday, April 3, 2022 9:20 PM  
**To:** Idaho MMEIR  
**Subject:** Idaho Maryland Mine Project

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Hello,

I am a local resident of Nevada County of 25 years. I am a business owner as well in the downtown area. My family has a home located off Hwy 174. The mining history in this County is nothing short of amazing. I have spent many days enjoying The Empire Mine and all that this towns Mining History has to offer. I would like to express my opinions about the Petition to reopen the Idaho Maryland Mine. I believe that the historic site should remain HISTORIC. I DO NOT WANT the project to BEGIN OR THE MINE TO REOPEN. The ecological damage that is sure to come if reopened would be devastating. Our water sources would be at risk, what little of it we have left. There are many reason why we should NOT reopen this mine. Including the lack of jobs it would present, the financial gain our community would NOT have and the 24 hr 7 day a week 80 year lease that would impact our community negatively. Thank you for Listening.  
Michelene Bowman

**Ind 587-1**



## **INDIVIDUAL LETTER 587: MICHELENE BOWMAN**

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### **Response to Comment Ind 587-1**

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not enable a more specific response. For concerns related to water sources, please see Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 588

Ind 588-1

~~I support re-opening the Idaho-Maryland Mine~~

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

**I DO NOT SUPPORT RE-OPENING THE MINE!**

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earning of more than \$72,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) MICHELLE BELON

Address 10894 BETTCHER CT. GRASS VALLEY ZIP 95945

Phone 530-559-2707

Email Address mabelon@yahoo.com





## **INDIVIDUAL LETTER 588: MICHELLE BELON**

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### **Response to Comment Ind 588-1**

The comment does not address the adequacy of the DEIR, but rather expresses opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 589**

**From:** [Michelle Lewis](#)  
**To:** [hcbosupervisors](#)  
**Subject:** Mine Reopening  
**Date:** Monday, January 24, 2022 10:44:49 AM

**Dist 4**

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**Ind 589-1**

Given years of drought, groundwater resources being over-utilized by more development, numerous wells already going dry, the idea of exploiting our limited water resources to benefit a foreign company with little cash reserves and no history of mine operation seems... the height of insanity.

Please vote against this ill-conceived proposal.

Thank you,  
Michelle Lewis



## **INDIVIDUAL LETTER 589: MICHELLE LEWIS**

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### **Response to Comment Ind 589-1**

The commenter generally expresses concerns related to drought and groundwater resources. Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 590**

**From:** Michelle Reynolds <mreynolds407@gmail.com>  
**Sent:** Wednesday, March 30, 2022 4:07 PM  
**To:** Idaho MMEIR  
**Subject:** Public Comment RE: Idaho Maryland Mine DRAFT EIR

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PLEASE DO NOT ALLOW THIS MINE PROJECT TO MOVE FORWARD IN NV COUNTY.

Through past employment, I have learned about and seen the destruction a major "modern" mining operation like the one proposed can produce in any environment.

Nevada County does NOT need and CANNOT support the disastrous environmental degradation of such an operation. If money or more jobs are needed in the county, we can promote much, much safer options, such as developing a world-class technology hub, among other things.

Thanks for your consideration.

--

  
Michelle Reynolds

*"Earth" without "art" is just "eh."*

Ind 590-1



## **INDIVIDUAL LETTER 590: MICHELLE REYNOLDS**

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### **Response to Comment Ind 590-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





Individual Letter 591

fl-18-2022

Dear planning Commission

Ind 591-1

I am writing to inform you that I am against the opening of the Idaho-Maryland Mine. NO permits should be granted.

Ind 591-2

If you at all care about this County, you will not permit the opening of the mine. The waste alone (no matter how "green" the company may run) is enough to see it's a bad idea, and it's the least of the harm opening the mine will cause.

Ind 591-3

Thank you for protecting this County and its residence, and NOT permitting the opening of the mine.

Sincerely, Mickey Jaynes.

MICKY JAYNES  
16909 Brac place cv  
(530) 575-6797  
mcmj619@gmail.com.



## **INDIVIDUAL LETTER 591: MICKEY JAYNES**

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### **Response to Comment Ind 591-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 591-2**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 591-3**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 592

RECEIVED

Dist 2

FEB 22 2022

Feb 18 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Dear Supervisors,

Ind 592-1

I am writing to inform you I am against the opening of the Idaho-Maryland Mine. No permits should be granted.

Ind 592-2

If you care about this County at all you will not permit the opening of the mine. The waste alone is enough to see its a bad idea, and its the least of the harm opening the mine will cause.

Ind 592-3

Thank you for not opening the Mine and for protecting the residence of this County.

Sincerely, Mickey Jaynes

MICKY JAYNES  
16909 Brac Place Av.  
(530) 575-6797  
mcmj619@gmail.com



## **INDIVIDUAL LETTER 592: MICKEY JAYNES**

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### **Response to Comment Ind 592-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

### **Response to Comment Ind 592-2**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

### **Response to Comment Ind 592-3**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.





**Individual Letter 593**

**From:** [Mielle.Chenier-Cowan.Rose](#)  
**To:** [Idaho.MMETB](#)  
**Subject:** No mine  
**Date:** Monday, February 14, 2022 8:01:58 AM

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**Ind 593-1**

Hello,  
I understand you are receiving public comment from Nevada county residents about the proposed reopening of the Idaho Maryland gold mine. I'm a homeowner who has lived here for 10 years, and I operate two businesses in this county. I am strongly opposed to this mine project, and am in full solidarity with the concerns of the [minewatchmc.org](http://minewatchmc.org) group.

**Ind 593-2**

This mine would pollute our water and air, drain our water table and hurt local wells, cause noise pollution, and risks our community's health. Gold mining has already had its run through this county, and the damages it's done to our local environment are plenty. Let's not go backwards on this.

Thank you for considering our concerns.  
~Mielle Chenier-Cowan Rose  
Grass Valley

--  
Sent from my iPhone. Please excuse mistakes and brevity.





## **INDIVIDUAL LETTER 593: MIELLE ROSE**

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### **Response to Comment Ind 593-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 593-2**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1 – Non-EIR and Administrative Issues, Master Response 15 – Adequacy of Groundwater Monitoring Wells, Master Response 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criteria Pollutant Thresholds During Operations. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 594**

**From:** [Michael Frasu](#)  
**To:** [hcbafsupervisors](#)  
**Subject:** mine  
**Date:** Friday, February 18, 2022 8:56:35 AM

**Dist 4**

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**Ind 594-1**

Mines of any kind are environmentally unfriendly.

**Ind 594-2**

1) You risk our water table in a terrible drought

**Ind 594-3**

2) Toxic chemicals introduced to the air and ground

**Ind 594-4**

3) Air pollution

**Ind 594-5**

4) Noise pollution

5) Traffic congestion in an already heavily congested area with more residential housing to come.

**Ind 594-6**

The jobs that will be created don't even come close to the negative benefits that they will bring. This is not a good idea whatsoever. I can't believe it was even considered from its very inception. Extremely poor decision.

**Ind 594-7**

How about a logging industry that would allow community residents to actually help the fire situation and give the common unskilled person a job. Between logging, trucking and milling you could really help in many aspects. Rather than a greed based foreign company with a bad track record to profit.

Don't you feel your integrity might be at risk on this decision.

Please give me the positive side of this decision other than some jobs?

Mike Frasu



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## **INDIVIDUAL LETTER 594: MIKE FRASU**

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### **Response to Comment Ind 594-1**

The comment does not directly address the adequacy of the DEIR. For water table and drought concerns, please see Master Responses 15 and 16.

### **Response to Comment Ind 594-2**

The comment does not directly address the adequacy of the DEIR. For concerns related to toxic chemicals and effects on air and ground, please see the analyses in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; and Chapter 4.7, Hazards and Hazardous Materials, of the DEIR.

### **Response to Comment Ind 594-3**

The comment does not directly address the adequacy of the DEIR. For concerns related to air quality, please see the analysis in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; and Master Response 18 – Air Quality Thresholds.

### **Response to Comment Ind 594-4**

The comment does not directly address the adequacy of the DEIR. Please see Master Response 1. Chapter 4.10, Noise and Vibration, contains a detailed discussion of the project's potential noise impacts.

### **Response to Comment Ind 594-5**

The comment does not directly address the adequacy of the DEIR. Please see Master Response 1. Chapter 4.12, Transportation, contains a detailed discussion of the project's potential transportation impacts.

### **Response to Comment Ind 594-6**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2.

### **Response to Comment Ind 594-7**

The comment does not address the adequacy of the DEIR, but rather appears to propose an alternative logging industry use for the project site. The DEIR evaluates alternatives to the proposed project in Chapter. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers.

Please see Master Response 3 regarding the comments about the applicant.



**Individual Letter 595**

30 Mar 22

Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902



Mr. Kelley,

I am writing in opposition to the Idaho-Maryland Mine project. I have received a solicitation for support from Rise Grass Valley, Inc. It suggests there is strong support throughout the community for the re-opening of the mine and that the mine will be safe for the community and the environment. Further, that it will bring jobs and money to our area with careers yielding average earnings of \$122,000 per year.

**Ind 595-1**

Based on what I have read and in speaking to individuals who live in the immediate area of the mine, I think the benefits of this project and the level of local support have been grossly overstated and the risks underestimated. I think the risk to the environment is great and will last for many years after the mining company has packed up and left and taken the lion's share of the profits with it.

The rhetoric here reminds me of what other large corporations say when selling their plans in smaller communities – they don't live in the area and will not have to live with the difficulties they create. The best jobs do not go to local folks nor does most of the money stay in our community.

I am not what you would typically call an environmentalist, but I am opposed to this project.

Mike French  
10838 Alta Sierra Drive  
Grass Valley, CA 95949

A handwritten signature in black ink, appearing to be "MF", with a long horizontal line extending to the right.



## **INDIVIDUAL LETTER 595: MIKE FRENCH**

---

### **Response to Comment Ind 595-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 596**

**Ind 596-1**

Matt Kelley, senior planner, Nevada county Planning Dept. 4-2-2002

Idaho Maryland Mine re-opening, Draft Environmental Impact Report

I have been farming organically with NID water for 36 years. My water would be tainted with any mistakes in monitoring that Rise Gold make. This mine would monitor itself with only occasional reports from Government monitoring. This is inappropriate. The fox watching the hen house is what it would be. The fox would be Rise gold making big money by sneaking polluted water down Wolf creek to the Tarr ditch to my farm. If my produce is polluted by this mine it would be on me to prove and take legal action for. A large corporation against a small farmer is what would result. The proposed EIR doesn't deal with this problem or many others appropriately.

Thank you Mike Pasner Owner Indian Springs Organic Farm



## **INDIVIDUAL LETTER 596: MIKE PASNER**

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### **Response to Comment Ind 596-1**

The commenter expresses concerns that any mistakes at the mine may taint water that could affect their farming operations. Please see Master Response 35 – Discharge to South Fork Wolf Creek.



Individual Letter 597

Way more than 2.4 million dollars when you  
**I support re-opening the Idaho-Maryland Mine** consider the  
Hydrology that had to have went out 20% at  
Least!  
a good  
thing

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Mike + Mary Peterson  
Address 19619 Legacy LN ZIP 95959  
Phone 265 3354  
Email Address MPeterson at JPS.net

Ind 597-1



## **INDIVIDUAL LETTER 597: MIKE AND MARY PETERSON**

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### **Response to Comment Ind 597-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.



**Individual Letter 598**

**From:** Jan and Mike Weaver <jm.mp31@hotmail.com>  
**Sent:** Friday, April 1, 2022 12:03 PM  
**To:** Idaho MMEIR; Matt Kelley  
**Subject:** Idaho Maryland Mine  
**Attachments:** Addendum Rise Gold Letter 2.2022.docx

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We are against the opening of this mine. We live approximately 4 miles from the mine and are opposed to its re-opening. Attached you will find some of our concerns.

**Ind 598-1**

Mike and Jan Weaver  
10818 Gunsmoke Road  
Grass Valley, CA 95945





	<p>County Board of Supervisors:</p> <p>I have several concerns regarding the Rise Gold Mine.</p>
<b>Ind 598-2</b>	<p>1. <b>Well Water:</b> Although we are 3.5 miles down Greenhorn, we may also be impacted by the voluminous amount of (possible contaminated) water that will be extracted from the mine. We are still in a drought and the snow disaster we had in December, reflects that. Trees had shallow roots because of the lack of water. The enormous amount of water that will be then sent down the South Folk Wolf Creek, perhaps overflowing its banks.</p>
<b>Ind 598-3</b>	<p>2. <b>Traffic:</b> As I left this morning at 8:45 a.m. to make my right onto Brunswick from Greenhorn I noted that there had to be a least 30 cars lined up at the flashing red light to enter the city or freeway. They were as far back as the exit from the mine on Brunswick. To add 100 trucks coming up from Bennett will probably put this line as far back as the "Y". Many people from outside of GV area, are probably unaware of the extra time it will take them each day to get either into our city or out of it.</p>
<b>Ind 598-4</b>	<p>3. <b>Toxicity:</b> Hard rock mining is extremely toxic. Our property was deemed an EPA Superfund in 1998 because of the tailing overflow from the 1997 storms. Because the County could not afford the clean-up, the federal agency stepped in and spent thousands of dollars to correct the toxic waste flowing down the Little Clipper Creek. Taxpayers from all over the country fund EPA. EPA continues to monitor this site and I understand it will always be deemed a Superfund site.</p>
<b>Ind 598-5</b>	<p>There are so many other reasons NOT to have this mine. Perhaps consider having it a permanent green waste space and build a cogeneration (cogen) plant, creating our own clean energy.</p> <p>We are no longer a Mining Town and anything built in that area should reflect 2022 ideas and not 1849 ideas.</p>



## **INDIVIDUAL LETTER 598: MIKE AND JAN WEAVER**

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### **Response to Comment Ind 598-1**

The comment does not address the adequacy of the DEIR, but expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 598-2**

The comment does not directly address the adequacy of the DEIR. Regarding well water and drought concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change. Regarding concerns about flow in South Fork Wolf Creek, please see Master Response 36 – Flows in South Fork Wolf Creek.

### **Response to Comment Ind 598-3**

The comment does not directly address the adequacy of the DEIR, but expresses concerns regarding the Brunswick Road/E. Bennett Road/Greenhorn Road intersection. According to the project's transportation analysis, the intersection of Brunswick Road/E. Bennett Road/Greenhorn Road currently operates acceptably at level of service (LOS) B and C during the "Project Traffic Hours". As discussed on page 4.12-8 of the DEIR,

Specific time periods were studied based on direction from Nevada County, which included the "standard" AM and PM peak hours and at the three time periods when project employee trips are expected to occur. Under the proposed work periods there is negligible traffic to and from the site during the AM and PM peak hours. The majority of project traffic occurs in the periods surrounding mining shift changes and the end of the administrative personnel work day as identified above; the end of the day for administrative personnel does occur during some peak periods, and this was reflected in the level of service analyses during the 3:30-4:30 PM analysis period. Based on these project-specific characteristics, the CEQA traffic analysis focuses on the three time periods when project employee trips would occur, as these time periods are expected to have the most project-related traffic impacts. The standard peak hour analysis is provided in the Traffic Impact Analysis for informational purposes (see Appendix O).

As shown in Tables 4.12-10 and 4.12-11, with inclusion of project traffic and traffic from 11 other near-term projects (for a listing, see pages 4.12-35 and 4.12-48 of the DEIR), the Brunswick Road/E. Bennett Road/Greenhorn Road intersection is projected to still operate acceptably at LOS B and C.

### **Response to Comment Ind 598-4**

The comment does not directly address the adequacy of the DEIR. It is unclear whether the commenter believes the project is an EPA superfund site. For clarity, neither the Brunswick nor the Centennial Industrial Site is an EPA superfund site. Toxic concerns are addressed in Chapter 4.7, Hazards and Hazardous Materials, and Chapter 4.8, Hydrology and Water Quality, of the DEIR.

### **Response to Comment Ind 598-5**

The comment does not address the adequacy of the DEIR, but rather appears to propose an alternative logging industry use for the project site. The DEIR evaluates alternatives to the proposed project in Chapter. As summarized in DEIR section 6.2, and provided in CEQA



Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers.

Regarding the commenter’s opposition to the proposed project, please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 599**

Mikos Fabersunne•508 Redbud Way•Nevada City, CA 95959-2156•530-362-7007•msfabersunne@sonic.net

March 24, 2022

County of Nevada  
Community Development Agency  
Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-8617  
Attn: Mark Kelley, Senior Planner

Subject: my comments on Idaho-Maryland Mine Project, Draft EIR

Dear Mr. Kelley:

**Ind 599-1**

I am writing to comment on the Draft EIR (DEIR) for the above project. I am a retired engineer, having last worked for the California Department of Toxic Substances Control (DTSC) in 2011 as a Hazardous Substances Engineer. During my service with the State I reviewed numerous environmental documents, including Preliminary Assessments/Initial Studies and EIR/EISs. I waited to submit comments on the subject project document, expecting that this project would be recognized for what it is--an attempt to deceive the public into believing that the project offers true public benefits to the community when the reality is that there will only be detriments--in the hope that the project proponents would cease further promotion of the project. However, apparently that was not the case, and so I am submitting my comments now.

**Ind 599-2**

I have read the prior comments on the NOP and the executive summary of the DEIR, as well as the tabulation of likely impacts and proposed mitigation measures delineated in Table 2-1. On its face, this project has so many unmitigable, detrimental impacts upon air quality caused by dust and equipment exhaust produced by digging and hauling operations from 24-hr/day, 7-day/week operation over the projected term of 80 years, and the resulting potential exposure of the public to lead, arsenic and mercury; the depletion of the sub-surface soil-water matrix from the continuous extraction of groundwater and the consequent impact of continuous discharge of the treated water to the environs, that it is folly to proceed with this project. The proponents would be better off to withdraw now, rather than making additional expenditures on preparing a final EIR.

**Ind 599-3**

There are many others who have seen through the fog of this project and have commented upon the expected adverse impacts on the soils and groundwater, and the threat to human and environmental health that it poses, that there is near universal opposition to this project by the residents of Grass Valley, Nevada City and the unincorporated areas near the project. I add my name to that list.

**Ind 599-4**

This project should be stopped as soon as possible to avoid the expenditure of additional county staff time and the public's effort in providing further review and analysis.

Thank you for your consideration,



Mikos Fabersunne, P.E.

Comment\_DEIR\_Mine\_24Mar22.docx



## **INDIVIDUAL LETTER 599: MIKOS FABERSUNNE**

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### **Response to Comment Ind 599-1**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 599-2**

The commenter expresses general concerns related to project air quality impacts. Air quality emissions and potential project health effects are evaluated in detail in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. Please also see Master Response 18 – Air Quality Thresholds, Master Response 19 – NSAQMD Criteria Pollutant Thresholds During Operations, Master Response 20 – Conservatism Used for Metals in Dust, Master Response 21 – Silica Health Risk, and Master Response 22 – Conservatism Used for Asbestos Assessment.

### **Response to Comment Ind 599-3**

Regarding groundwater extraction concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding concern related to continuous discharge of treated water, please see Master Response 35 – Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 599-4**

The commenter expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 600**

**From:** [Miles Wolfers](#)  
**To:** [Sue Hoek](#); [idofsupervisors](#)  
**Subject:** Opposition to the Mine  
**Date:** Wednesday, March 23, 2022 5:31:26 PM

Dist 4

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**Ind 600-1**

I DO NOT support the opening of the Idaho-Maryland Mine. I have lived here my whole life, and loved growing up in our beautiful community the way it is, and the way it has been for years; natural and clean. We do not need dust and smog clogging our air. The mine would be severely detrimental to the lives of me and all our fellow locals.

Opening the mine is a bad idea.

Thank you for your time,  
Miles Wolfers



## **INDIVIDUAL LETTER 600: MILES WOLFERS**

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### **Response to Comment Ind 600-1**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 601**

**Dist 4**

Dear Board of Supervisors,

March 2, 2022

**Ind 601-1**

Pardon the profanity on the enclosed card. I was going to just drop it in the mail and let the mine advocates know how I feel.

Instead, I was told by some politically wise friends that Rise Grass Valley will most likely not read it, but add it to a pile of postcards and make it look like the returning of postcards affirms the community's desire for the mine to open.

Their tactics are appalling, including the brochure that included this postcard.

**Ind 601-2**

If you have any desire to protect this beautiful area of ours, you must know how destructive this mine will be to our environment, disrupt many residents' wells, tremendously increase traffic in the Brunswick Basin, etc.

**Ind 601-3**

I've been a resident for over 40 years. I volunteered for over 10 years for Meals on Wheels, raised money for Hospitality House, and have brought 2 free health care clinics to our community. In other words, I've been a big contributing member of our community. Should this mine be allowed to open, I am seriously considering moving.

I implore you to not let this mine open.

**RECEIVED**

MAR 07 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Sincerely, 

Mindy Oberne  
13169 Twin Star Lane  
Grass Valley, CA 95949

**Ind 601-4**

**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) \_\_\_\_\_  
Address \_\_\_\_\_ ZIP \_\_\_\_\_  
Phone \_\_\_\_\_  
Email Address \_\_\_\_\_  




## **INDIVIDUAL LETTER 601: MINDY OBERNE**

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### **Response to Comment Ind 601-1**

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 601-2**

The comment does not directly address the adequacy of the DEIR. Please see Master Response 1. Regarding well impact concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding traffic-related concerns, please refer to Chapter 4.12, Transportation, for a detailed project transportation analysis.

### **Response to Comment Ind 601-3**

The comment does not address the adequacy of the DEIR. Please see Master Response 1.

### **Response to Comment Ind 601-4**

The comment does not address the adequacy of the DEIR, but rather expresses opposition to the project. Please see Master Response 1.



**Individual Letter 602**

**From:** Mira Clark <existinspired@gmail.com>  
**Sent:** Sunday, April 3, 2022 9:08 PM  
**To:** Idaho MMEIR  
**Subject:** Comments on (DEIR)

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Dear Matt,

**Ind 602-1**

I am writing a letter as a concerned resident of Nevada County. I was born here and have lived all over Nevada County, and Grass Valley and have called this place home for the past 31 years.

I am not convinced by the DEIR that adequate measures would be taken by RISE to ensure that toxic Heavy Metal Contamination & Leaching into groundwater would not occur to groundwater, neighboring wells and nearby waterways. I am also not convinced of the mitigation measures described in the DEIR to protect special-status wildlife species. The proposed mitigation measures do not appear to be realistic and disruption to wildlife described in Chapter 4.4 – (Biological Resources) would likely still occur to a significant level. Accounting for mitigation of noise and work/construction disturbances seems impossible to mitigate to a level that would not cause a significant negative impact on wildlife AND still allow RISE to construct and operate the mine feasibly.

**Ind 602-2**

This is an opinion-based argument, however still valid; How can we trust a foreign company with no local stake in the wellbeing of our local environment and community to do a good job at ensuring safety? Their main motive is extraction-based profit and that overshadows any significant environmental commitment the Rise company has in keeping this land safe and healthy for the current and future generations, I find this to be abundantly evident. If the state of our current world shows anything, it is that corporate greed knows no bounds in its manipulation and ability to cut corners for more profits. It harkens back to the devastation caused by colonial settler Gold Mining extraction which caused a near genocide of the Nisenan People and a huge negative environmental impact. Which our local rivers and wells and lands and Indigenous Peoples are still recovering from... As a volunteer of the local Nisenan Tribe's non-profit CHIRP for over 5 years, I am all too aware of this horrific legacy and history. WE must do better in 2022!

Thank you,

**Mira Clark**  
13000 Gary Lane  
Nevada City CA, 95959  
530-559-6115





## **INDIVIDUAL LETTER 602: MIRA CLARK**

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### **Response to Comment Ind 602-1**

The commenter expresses general concerns regarding water quality impacts from operation of the mine. The DEIR addresses water quality in Chapter 4.8, Hydrology and Water Quality, and concluded that impacts would be less than significant after mitigation. Regarding potential impacts to special-status wildlife species, please see Master Response 31 – Rare Plants, Master Response 37 – Birds and Raptors, and Master Response 38 – Foothill Yellow Legged Frog and California Red Legged Frog. The potential effect of noise on wildlife is addressed in Impact 4.4-2 (p. 4.4-74) of the DEIR.

### **Response to Comment Ind 602-2**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the applicant and project. Please see Master Responses 1 through 3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 603**

**From:** Molly Harrison <harrisonmolly@yahoo.com>  
**Sent:** Monday, April 4, 2022 1:37 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** Draft EIR Rise Mine

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April 4, 2022  
Nevada County Planning Department  
950 Maidu Avenue, Ste 170  
Nevada City, CA. 95959-790

Attn: Planning Commission/Board of Supervisors

**Ind 603-1**

To Whom It May Concern:  
My family has lived here in Nevada County since 1994. I fear this beautiful place and habitat for so much wildlife is now in jeopardy with the proposed mine. I am very much against it due to its effect on the environment. I am concerned about the mine's potential impact on our air, land and water quality. I do not believe the Draft EIR. It seems very likely that mining will drain our ground water sources which may affect our wells that are already being threatened by droughts. I am also troubled by the thought of the diesel fumes and constant noise the equipment will make. This mine will definitely affect our quality of life in many ways in Nevada County. We live close enough to Highway 20 and 49 so we will be impacted by this noise and pollution, as do many other residents.

**Ind 603-2**

As I understand this proposal, there is no independent monitoring of any of these issues and I would like this inadequacy to be addressed. I would also appreciate a response to my concerns as they are the same as just about everyone I know around this area. We already have so many reasons to flee California with the drought, fire and tax issues, and we don't need another reason to leave. Furthermore, the history of Rise Gold does not instill confidence. I am very unhappy with the idea of bringing in a non-local company with no track record of success in this area. We should not be a test case!!!

**Ind 603-3**

According to Ralph Silberstein, President of CEA Foundation, "This DEIR is riddled with errors, omissions, and legal flaws. We'll see many more impacts listed as significant and unavoidable. Beyond the EIR, our Supervisors will be faced with making the final decision. In the long run, it will very simply come down to whether the mine is good for our community."

Some of the top concerns include:

The groundwater model has fundamental flaws in the initial start point and baseline data assumptions – all of which throw off the entire analysis.



<b>Ind 603-4</b>	Dealing with mine waste – Asbestos will be a huge and expensive problem that requires far more comprehensive management than described in the report.
<b>Ind 603-5</b>	Greenhouse gas emissions - The report excluded elements that would put the project over an arbitrary threshold limit, but recent climate change goals say the threshold should be “net zero”.
<b>Ind 603-6</b>	Cleanup of the toxic, pre-superfund Centennial site that would be used to dump mine waste is not included in the DEIR but is required by the California Environmental Quality Act (CEQA).
<b>Ind 603-7</b>	Missing construction time estimates throw off the entire analysis of noise, traffic, and air.
<b>Ind 603-8</b>	The DEIR incorrectly assesses nighttime noise and underestimates the noise of dumping mine waste near established residential neighborhoods.
<b>Ind 603-9</b>	Air traffic hazards and aesthetic impacts need to be studied further due the likelihood of a moisture cloud plume that could be created by warm, saturated air ventilation.
<b>Ind 603-10</b>	Blasting plans don’t follow U.S. mining guidelines that restrict blasting during evening hours.
<b>Ind 603-11</b>	The plan doesn’t demonstrate that the impact on biological and aquatic resources would be less than significant.
<b>Ind 603-12</b>	Meteorological data used to assess the health risk of airborne pollutants doesn’t fit Grass Valley’s profile or accurately reflect local conditions.  Our environment is so special; we cannot take these kinds of risks with it.
	Sincerely Prof. <del>Kurtig</del> <del>Min</del> <del>Zulu</del> <del>Sto</del> JW Pfahl and Molly Harrison  15240 Lewis Road  Nevada City, CA. 95959



## **INDIVIDUAL LETTER 603: MOLLY HARRISON**

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### **Response to Comment Ind 603-1**

The commenter is opposed to the project due to a variety of impacts pertaining to groundwater, air quality, and noise but provides no additional detail as to why the DEIR is inadequate. Regarding impacts to air quality and noise, the commenter is referred to Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and Chapter 4.10 (Noise and Vibration). Regarding impacts to groundwater, the commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. The commenter's opposition to the project is noted for decision makers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 603-2**

The commenter states that no independent monitoring program is proposed for the project. The commenter also references prior mining projects by the Project Applicant. Among the many mitigation measures required in the DEIR are monitoring programs for noise (Mitigation Measure 4.10-3), vibration (Mitigation Measure 4.10-4), and groundwater (Mitigation Measure 4.8-2), all of which will have oversight from Nevada County. In addition, Chapter 4 of this Final EIR contains the mitigation monitoring and reporting program that will need to be adopted by the Nevada County Board of Supervisors, if the project is approved. The MMRP includes all of the project mitigation measures, identifies timing for completion of mitigation requirements, and identifies local and state agencies responsible for monitoring. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 603-3**

The commenter states that the DEIR's groundwater model is flawed but does not explain how. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 603-4**

The commenter states that the project will produce asbestos-related impacts. The commenter is referred to Chapter 4.3 of the DEIR, Master Response 22 - Conservatism of Asbestos Assumptions, Master Response 23 - Adequacy of Asbestos Sampling, and Master Response 18 - Air Quality Thresholds.

### **Response to Comment Ind 603-5**

The commenter states that the DEIR's analysis of GHG emissions is flawed because the threshold should be net zero. A net zero threshold is not required for the project. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

### **Response to Comment Ind 603-6**

The commenter states that CEQA requires a discussion of the remediation of the Centennial Industrial Site to be included in the DEIR. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.



**Response to Comment Ind 603-7**

The commenter states that the DEIR's absence of a construction schedule skews the analysis of several project impacts. The commenter is referred to Master Response 24 - Project Construction Schedule.

**Response to Comment Ind 603-8**

The commenter states that the DEIR incorrectly assesses nighttime noise and the dumping of mine waste. Nighttime noise including dumping of mine waste is analyzed in Chapter 4.10 of the DEIR and is less than significant after mitigation. Please also see Responses to Comments Grp 21-130 and 21-131.

**Response to Comment Ind 603-9**

The commenter states that the DEIR must include analysis of aesthetics and air traffic hazards caused by a moisture cloud plume. The commenter is referred to Response to Comment Grp 7-95.

**Response to Comment Ind 603-10**

The commenter states that the project does not follow federal mining guidelines. The commenter is referred to Response to Comment Grp 21-144.

**Response to Comment Ind 603-11**

The commenter states that the DEIR does not adequately demonstrate that the impacts to biological or aquatic resources are less than significant, but does not state why. The commenter is referred to Chapter 4.4 (Biological Resources) and 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 30 - Biological Study Technical Adequacy, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Fork Wolf Creek.

**Response to Comment Ind 603-12**

The commenter states that the Health Risk Assessment does not use appropriate data for local conditions. The commenter is referred to Master Response 17 - Meteorological Data Used in HRA.





**Individual Letter 604**

March 23, 2022

Nevada County Planning Department  
950 Maidu Avenue, Ste 170  
Nevada City, CA. 95959-790

Attn: Planning Commission/Board of Supervisors

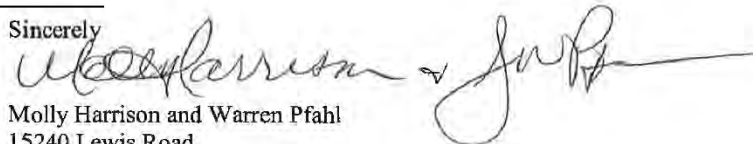
To Whom it May Concern:

My name is Molly Harrison and my family has lived here in Nevada County since 1994. I fear this habitat is now in jeopardy with the proposed mine and I am very much against it due to its effect upon it. I am concerned about its impact on our air, land and water quality. It very likely will drain our ground water sources which may affect our wells that are already being threatened by droughts. I am also troubled by the thought of the diesel fumes and constant noise the equipment will put out. This mine will definitely affect our quality of life in many ways in Nevada County. We live close enough to Highway 20 and 49 to be impacted by this noise and pollution, as do many other residents, as it is impossible to avoid.

Ind 604-1

As I understand this proposal, there is no independent monitoring of any of these issues and I would like this inadequacy to be addressed. I would also appreciate a response to my concerns as they are the same as just about everyone I know around this area. We already have so many reasons to flee California with the drought, fire and tax issues, and we don't need another reason to leave. Furthermore, the history of Rise Gold does not instill confidence. I am very unhappy with the idea of bringing in a non-local company with no track record of success in this area. We should not be a test case!!! Our environment is so special; we cannot take these kinds of risks with it.

Sincerely



Molly Harrison and Warren Pfahl  
15240 Lewis Road  
Nevada City, CA. 95959



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## **INDIVIDUAL LETTER 604: MOLLY HARRISON AND WARREN PFAHL**

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### **Response to Comment Ind 604-1**

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not enable a more specific response. For concerns related to air, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. For concerns related to water quality, please see Chapter 4.8, Hydrology and Water Quality. For concerns related to well impacts and drought, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change. Regarding diesel fume concerns, please see Response to Comment Grp 21-66. For noise concerns, please see Chapter 4.10, Noise and Vibration.

The commenter incorrectly states that there will be no independent monitoring of any of the issues that they are concerned with. For example, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Mitigation Measure 4.10-2 also requires quarterly noise monitoring by the County's third-party noise consultant during the first five years of project operation, and once per year thereafter for the life of the project.

In addition, the mitigation measures set forth in the DEIR to reduce the severity level of potential impacts specify the monitoring agency responsible for ensuring the mitigation is implemented as written in the DEIR. The Mitigation Monitoring and Reporting Program (MMRP) prepared as part of this Final EIR (Chapter 4) includes a column that summarizes the monitoring agency required by each mitigation measure.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 605

IDAHO-MARYLAND MINE PROJECT  
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Molly Nichols  
Address: 2477 Blue Sage Way Nevada City CA  
Organization (if applicable): \_\_\_\_\_

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by 5:00 PM, April 4, 2022. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 95959-8617  
Idaho.MMEIR@co.nevada.ca.us

Ind 605-1

My impression from the speakers ~~and the speaker~~ I saw today at the Road Center is that Rise Corp has not submitted clear Research / Science that Hydraulic mining hasn't affected air + water health. We as a community have every right to be concerned that the benefits do not outweigh the risks ~~there is no clear science~~ Please take a stand against greed for future generations and ourselves.  
protect our waters  
investigate fully

3/24/2022

Molly Nichols



## **INDIVIDUAL LETTER 605: MOLLY NICHOLS**

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### **Response to Comment Ind 605-1**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 606**

**From:** Mykola Kindrat <m.kindrat@gmail.com>  
**Sent:** Friday, April 1, 2022 9:31 AM  
**To:** Idaho MMEIR  
**Subject:** I oppose Idaho Mine reopening!!!

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Dear Matt Kelley,

I've been a resident of Nevada County for almost 10 years now. I love this rural community and value its peaceful lifestyle. I know the history of gold mining in this area and the ecological damage it has done. We still, a century later, can't eat the fish from our rivers and ponds - because of pollution from mining!

Reopening the Idaho-Maryland mine, right in the heart of the city, is extremely dangerous and will cause trouble for decades or even centuries in the future. Re-evaluation of the impact reports presented by Rise shows multiple errors, omissions, not to mention their manipulation of the public with a flashy mailer they sent out, which is a red sign in itself.

I believe that the only people that are to benefit from this "project" are the shareholders of the company and those they try to bribe. But not the Community, not the people who live here, not our water, air and soil!

I strongly oppose the reopening! Don't let that happen!!!

Sincerely,  
Mykola Kindrat

**Ind 606-1**





## **INDIVIDUAL LETTER 606: MYKOLA KINDRAT**

---

### **Response to Comment Ind 606-1**

The commenter refers to multiple errors and omissions in “impact reports presented by Rise” but does not identify specific documents, nor specific alleged errors and omissions. Without such evidence, no further response is possible. The commenter’s opposition of the proposed project is noted and forwarded to the decisionmakers. Please see Master Response 1.



**Individual Letter 607**

**From:** [Nancy Dewey](#)  
**To:** [Idaho MMEIR](#)  
**Subject:** Inadequacy of DEIR  
**Date:** Wednesday, March 23, 2022 5:56:55 PM

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Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

via email: [Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

Mr Kelly,

First, thank you for your service to our community. I know there are strong feelings about a lot of current issues and some in our community are not treating our elected officials and public agency employees with the respect they deserve. I am strongly opposed to the Idaho-Maryland Mine Project for a multitude of reasons and have significant concerns about the findings and inadequacies of the Draft Environmental Impact Report (DEIR). I will focus on one area of concern in this letter, traffic impacts. I hope my sincere and strongly held beliefs about the negative impacts of this proposed project are presented in a constructive manner.

**Ind 607-1**

Approval of this project, according to the DEIR, will add up to a maximum of 100 round trips per day and an average of 50 round trips per day, over a 16-hour period (6:00 AM to 10:00 PM), transporting engineered fill. Thus, over the life of the project, up to 118 haul truck round trips would occur on Brunswick Road during the hours from 6:00 AM to 10:00 PM, seven days a week. On an hourly basis, this equates to approximately 7.4 haul truck round trips per hour on Brunswick Road. Up to 18 additional truck trips could occur per day for various operations (gold concentrate shipping, materials deliveries, etc.).

As stated in the DEIR there will be significant and unavoidable impacts to traffic, most notably in the following areas: Bennett Road at Tinloy Street, Brunswick Road at Idaho Maryland Road, Brunswick Road at Whispering Pines Lane, Brunswick Road at E. Bennett Road, and Brunswick Road at SR 174. Some of these intersections are already poorly designed and dangerous intersections with accidents occurring on a regular basis. Approval of this project without adequately addressing and mitigating the impact to local citizens driving these roadways is unacceptable. In addition to the traffic impacts, running an industrial mining operation utilizing trucks in a neighborhood means additional noise, dust, vibrations to the citizens in these neighborhoods, facts the DEIR does not adequately address.

When the Mine is in operation the 400-600 "local" employees Rise Gold claims they will



↑ employ will add further traffic to these roadways. We know these workers will not be living in Grass Valley, as the lack of affordable housing is already an issue for our community. So, that will mean an additional 400-600 cars on the already identified significant and unavoidable impacts to traffic, a key factor the DEIR failed to adequately address.

Ind 607-2

In addition to these already identified issues, what concerns me even more is the impact to evacuation routes in the event of fire. As stated in the DEIR, "According to CAL FIRE, relatively few larger wildfires have occurred within the region surrounding the project sites over the past three years". I disagree with this statement as I am sure those that lost their homes in the River Fire and the Jones Fire also would. In addition to these fires, the DEIR needs to address the potential environmental impact the Whispering Pines Fire, would have created if this project was in operation. In the DEIR there are some statements that we could "ask" the mine operations to discontinue the truck routes in the event of a fire. Ask?

As we are in another year of drought and increased fire danger, I find it unconscionable that the County would approve a project that would that would add significant and unavoidable impacts to traffic along the evacuation routes people would need to use. The DEIR seems to imply there are other evacuation routes, but I assure you, our current residents and 400-600 additional vehicles and large trucks will be using Brunswick to get to 174 and 49/20, and Brunswick will be at a standstill trying to get on 174. This is a significant and real potential disaster for this community.

In the 20 years we have lived in this community, that we love, I have served for 8 years as a Board member and President of the the Chicago Park School District and 8 years as a member of the Board of the Center for the Arts. We are significant financial donors to numerous local non profit organizations. If this project is approved, we will sell our Cedar Ridge home and regrettably move out of the area, where we will contribute our time and substantial financial charitable contributions to our new community.

Ind 607-3

Respectfully,

Nancy Dewey

13035 Somerset Drive  
Grass Valley, CA 95945  
[nancy@deweys.org](mailto:nancy@deweys.org)



## **INDIVIDUAL LETTER 607: NANCY DEWEY**

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### **Response to Comment Ind 607-1**

The commenter incorrectly identifies the significant and unavoidable traffic impacts identified in the DEIR. Chapter 4.12, Transportation, concludes that the project's traffic impacts would be less than significant after mitigation, with the exception of traffic at the SR 174 and Brunswick Road intersection and the northbound left lane at the Brunswick Road and Sutton Way intersection, which would be significant and unavoidable due to the uncertainty of the mitigation measures identified in the DEIR.

For the commenter's general concerns about noise and vibration, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Dust effects from mining operations are addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy.

The commenter also expresses concern regarding employee trips. Employee trips are already accounted for in the transportation analysis presented in Chapter 4.12 of the DEIR. See Table 4.12-8, Project Trip Generation.

### **Response to Comment Ind 607-2**

Regarding the commenter's evacuation route concerns, please see Master Response 5 – Evacuation Zones. Regarding drought concerns, please see Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 607-3**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 608**

**From:** [Nancy Dewey](#)  
**To:** [Idaho MMEIB](#)  
**Cc:** [bdofsupervisors](#)  
**Subject:** Oppose Idaho-Maryland Mine Project  
**Date:** Sunday, March 20, 2022 7:28:52 PM

Dist 3

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Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

via email: [Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

Mr Kelly,

First, thank you for your service to our community. I know there are strong feelings about a lot of current issues and some in our community are not treating our elected officials and public agency employees with the respect they deserve. I am strongly opposed to the Idaho-Maryland Mine Project for a multitude of reasons and have significant concerns about the findings and inadequacies of the Draft Environmental Impact Report (DEIR). I will focus on one area of concern in this letter, traffic impacts. I hope my sincere and strongly held beliefs about the negative impacts of this proposed project are presented in a constructive manner.

Approval of this project, according to the DEIR, will add up to a maximum of 100 round trips per day and an average of 50 round trips per day, over a 16-hour period (6:00 AM to 10:00 PM), transporting engineered fill. Thus, over the life of the project, up to 118 haul truck round trips would occur on Brunswick Road during the hours from 6:00 AM to 10:00 PM, seven days a week. On an hourly basis, this equates to approximately 7.4 haul truck round trips per hour on Brunswick Road. Up to 18 additional truck trips could occur per day for various operations (gold concentrate shipping, materials deliveries, etc.).

As stated in the DEIR there will be significant and unavoidable impacts to traffic, most notably in the following areas: Bennett Road at Tinloy Street, Brunswick Road at Idaho Maryland Road, Brunswick Road at Whispering Pines Lane, Brunswick Road at E. Bennett Road, and Brunswick Road at SR 174. Some of these intersections are already poorly designed and dangerous intersections with accidents occurring on a regular basis. Approval of this project without adequately addressing and mitigating the impact to local citizens driving these roadways is unacceptable. In addition to the traffic impacts, running an industrial mining operation utilizing trucks in a neighborhood means additional noise, dust, vibrations to the citizens in these neighborhoods, facts the DEIR does not adequately address.

When the Mine is in operation the 400-600 "local" employees Rise Gold claims they will

Ind 608-1





↑ employ will add further traffic to these roadways. We know these workers will not be living in Grass Valley, as the lack of affordable housing is already an issue for our community. So, that will mean an additional 400-600 cars on the already identified significant and unavoidable impacts to traffic, a key factor the DEIR failed to adequately address.

Ind 608-2

In addition to these already identified issues, what concerns me even more is the impact to evacuation routes in the event of fire. As stated in the DEIR, "According to CAL FIRE, relatively few larger wildfires have occurred within the region surrounding the project sites over the past three years". I disagree with this statement as I am sure those that lost their homes in the River Fire and the Jones Fire also would. In addition to these fires, the DEIR needs to address the potential environmental impact the Whispering Pines Fire, would have created if this project was in operation. In the DEIR there are some statements that we could "ask" the mine operations to discontinue the truck routes in the event of a fire. Ask?

As we are in another year of drought and increased fire danger, I find it unconscionable that the County would approve a project that would that would add significant and unavoidable impacts to traffic along the evacuation routes people would need to use. The DEIR seems to imply there are other evacuation routes, but I assure you, our current residents and 400-600 additional vehicles and large trucks will be using Brunswick to get to 174 and 49/20, and Brunswick will be at a standstill trying to get on 174. This is a significant and real potential disaster for this community.

In the 20 years we have lived in this community, that we love, I have served for 8 years as a Board member and President of the the Chicago Park School District and 8 years as a member of the Board of the Center for the Arts. We are significant financial donors to numerous local non profit organizations. If this project is approved, we will sell our Cedar Ridge home and regrettably move out of the area, where we will contribute our time and substantial financial charitable contributions to our new community.

Ind 608-3

Respectfully,

Nancy Dewey

13035 Somerset Drive  
Grass Valley, CA 95945  
[nancy@deweys.org](mailto:nancy@deweys.org)



## **INDIVIDUAL LETTER 608: NANCY DEWEY**

---

### **Response to Comment Ind 608-1**

Please see Response to Comment Ind 607-1.

### **Response to Comment Ind 608-2**

Please see Response to Comment Ind 607-2.

### **Response to Comment Ind 608-3**

Please see Response to Comment Ind 607-3.



**Individual Letter 609**

**From:** Nancy Henson <nancylmh1@gmail.com>  
**Sent:** Monday, April 4, 2022 12:28 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-n.c.org  
**Subject:** DEIR comments

**Ind 609-1**



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Respectfully submitted,  
Nancy Henson  
14148 Grizzly Hill Road  
Nevada City, CA 95959



## **INDIVIDUAL LETTER 609: NANCY HENSON**

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### **Response to Comment Ind 609-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





Individual Letter 610

**From:** Nancy Piette <nancy.piette4@gmail.com>  
**Sent:** Saturday, April 2, 2022 4:39 PM  
**To:** Matt Kelley  
**Subject:** DEIR comments

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Dear Mr. Kelley,

I have been a resident in the Grass Valley/Nevada City area for about 40 years and raised my two children here. I was an employee of the Nevada County Public Health Department for 22 years and remain interested and concerned about the health and welfare of all Nevada County residents.

I have comments about two areas of the DEIR about the proposed re-opening of the Idaho-Maryland Mine. The first area is that of **Hazardous Materials**. Chapter 4.7 page 35 states that **significant impacts are possible** for release of arsenic or other harmful chemicals. I think proposed mitigation measures are inadequate in that no procedures are stated regarding supervision of Rise Gold employees if they encounter potentially hazardous soil. The mitigation measure (4.7-2(b)) lays responsibility squarely on Rise Gold workers, stating that **"work shall stop"** in "an area of possible contamination" if "unidentified or suspected contaminated soil evidenced by..."

Ind 610-1

Would Rise Gold employees be given any **training** on how to recognize potentially hazardous soils or materials? There is no mention of this in the DEIR. Would a site **supervisor be observing** onsite as workers uncover new areas of soil? **I am concerned that depending on Rise Gold employees to "stop work" is an unreasonable and inadequate mitigation measure.** Stopping work and calling in a Registered Environmental Assessor (REA) or other "qualified assessor" may be unlikely unless employees are conscientiously supervised. And how inconvenient would it be to call in an REA? Very inconvenient. So a "qualified assessor" would likely be used, if any, and how "qualified" would that person be in assessing toxic risk?

**Rise Gold's CEO does not have a good track record in containing hazardous materials,** based on his toxic waste spill in B.C., Canada in 2015. **Should we trust him and his employees to identify toxic materials in Nevada County?**

Ind 610-2

I am also concerned about **Air Quality (AQ)** monitoring. I noted that the DEIR is inaccurate in stating that construction would be occurring from Jan.-Dec. 2021, **last year**. I also noted that **air quality impacts could be significant**. Given that, I think mitigation measures are **inadequate** because they do not state a **minimum frequency** of AQ monitoring. Page 84, Chapter 4.7 states that NSAQMD "may require air quality monitoring at any time", but **how often** would monitoring occur? Once a year? Once a month? Since AQ impacts could be significant, an appropriate monitoring frequency should be stated in the final EIR and tracked carefully by a stated regulatory agency.



I appreciate this opportunity to comment on the DEIR, and I thank you for your diligent work on this document.

Sincerely,

Nancy C. Piette

Registered Dietitian, Master of Science, Public Health



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## **INDIVIDUAL LETTER 610: NANCY PIETTE**

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### **Response to Comment Ind 610-1**

The commenter expresses concern regarding arsenic or other harmful chemicals at the project site and states that the mitigation measures to address Impact 4.7-2 are inadequate. Primarily, the commenter questions whether on-site employees would be adequately trained in order to recognize hazardous materials and take appropriate actions. The commenter also raises concerns regarding past projects of the Project Applicant's CEO.

Regarding training, the federal Occupational and Safety Health Act (OSH) requires hazardous materials operators to receive an initial 40 hours of training, as well as an annual eight-hour refresher course, which includes training regarding personal safety, hazardous materials storage and handling, and emergency response. (DEIR, p. 4.7-12.) Additionally, Mitigation Measure 4.7-2(a) requires the project contractor, in the event that the portion of the Brunswick Site containing arsenic is disturbed, to retain a Certified Industrial Hygienist to develop specific handling procedures for mine waste and dust mitigation. (DEIR, p. 4.7-35.)

Comments regarding past projects of the Project Applicant's CEO are not relevant to the adequacy of the DEIR; however, the commenter is referred to Master Response 3 – Operator Responsibility.

### **Response to Comment Ind 610-2**

The commenter is concerned about air quality monitoring because mitigation measures do not state a minimum frequency of monitoring. The commenter appears to be referencing Mitigation Measure 4.3-2 on page 4.3-82 of the DEIR, which requires an Asbestos Dust Mitigation Plan (ADMP). As stated in the mitigation measure, air monitoring requirements and frequency of air monitoring are provided in the approved ADMP and the NSAQMD may require air monitoring at any time. The minimum frequency of air sampling is not known at this time and not required for the analysis of the DEIR. Notably, compliance with the California Air Resources Board Airborne Toxic Control Measures for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

The starting year presumed in the Air Quality study has already passed but that does not affect the analysis of the DEIR. The project assumes a compressed construction schedule where many activities overlap to provide the most conservative estimate of air quality, traffic, noise and other impacts. An increase in the duration of construction activities and/or the completion of activities sequentially would serve to reduce environmental impacts in many areas. As such, the approach taken by the DEIR overestimates impacts as compared to a longer construction schedule with less overlapping activities. Please see Master Response 24 - Project Construction Schedule.





Individual Letter 611



Feb. 20, 2022

Matt Kelley, Senior Planner,

After reviewing the Draft Environmental Impact Report, I am publicly voicing my opposition to the re-opening of the Mine Project.

Ind 611-1

I have lived on Greenhorn Road since 2004. My husband and I intend to live out our final years on the beautiful 40 acres we own. We came to this property, to enjoy the peace, beauty and quality of life we have created for ourselves. This quality of life will come to an end for us if the mine is allowed to reopen in our rural residential area.

Ind 611-2

There have been 83 negative impacts illuminated by the report, with many *significant* enough to stop the project by themselves. We came here to retire and have our custom home be our final stop before turning over the property to our children who will inherit at our demise. If the mine is re-opened, property values will decrease up to 20%. *Who wants to live next to a heavy, extractive, toxic industry?* There are hundreds of my neighbors who will be similarly affected by heavy industry in our midst. Changing the zoning from light industry to heavy would be criminal in the midst of so many people living in the area.

Ind 611-3

Our main concerns are:

- Our water wells will be further dewatered (already our extreme climate change has dried up 3 of our 5 wells), and the likelihood of toxic pollutants used in mining will be dumped into South Fork Wolf Creek destroying the ecosystem.

Ind 611-4

- Our air quality will be further degraded ( already we have poor air quality rating due to our topography and relation to smog from the valley ). The mining project would spew clouds of airborne toxic mining dust and toxic diesel exhaust from heavy trucking. This is an extreme risk to our health.

Ind 611-5

- The noise of operations at the mine will destroy our peace. At our age, we relish the gift of the sounds of trees soughing and the birds singing.

Ind 611-6

- Traffic will be hazardous to negotiate with so many heavy trucking trips on our rural roads to the Centennial site to dump waste rock. Greenhorn Road is a one way in, and one way out road, with hundreds of residents along (and off) it's 7 miles. In a wildfire evacuation, the risk of a deadly outcome for the hundreds of residents along the 7 miles of Greenhorn road would be increased if big trucks were clogging the roadway.

Ind 611-7

- It does not make sense to reopen a mine that has been closed for 66 years; while in the meantime, our population has grown into the area that has become residential with *hundreds of people living on top of old, toxic, best left alone, 2585 acres of Rise Gold's underground mineral rights.*

Ind 611-8

I believe it is more important to our future health as a community *to not allow hard rock mining*, which is the single largest source of toxic waste in the United States, back into our now beautiful area that is a tourist destination and desirable place to live.

Sincerely,  
Nancy Rojo

17150 Greenhorn Road, Grass Valley, CA 95945 (Mailing address; P.O. Box 47, Cedar Ridge, CA 95924)  
1-530-274-7336

email to: [nancytrojo@gmail.com](mailto:nancytrojo@gmail.com)



## **INDIVIDUAL LETTER 611: NANCY ROJO**

---

### **Response to Comment Ind 611-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 611-2**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

### **Response to Comment Ind 611-3**

For concerns related to water wells and climate change, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change. For concerns related to pollutants being dumped into South Fork Wolf Creek, please see Master Response 35 – Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 611-4**

The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds.

### **Response to Comment Ind 611-5**

Based on the project-specific noise analysis, which was independently reviewed by the County's third-party noise consultant, none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.





**Response to Comment Ind 611-6**

Please see Master Response 5 – Evacuation Zones.

**Response to Comment Ind 611-7**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. Regarding the commenter's reference to the 2,585-acre mineral rights boundary, it is recommended to review Master Response 7 – Location of Future Mining Areas.

**Response to Comment Ind 611-8**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 612

**From:** [Nancy Taylor Rojo](#)  
**To:** [bobfsupervisors](#); [Heidi Hall](#); [Ed Scofield](#); [Dan Miller](#); [Sue Hoek](#); [Hardy Bullock](#)  
**Subject:** Comment to the DEIR  
**Date:** Tuesday, February 22, 2022 7:46:32 AM

Dist 1

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Ind 612-1

After reviewing the Draft Environmental Impact Report, I am publicly voicing my opposition to the re-opening of the Mine Project.

I have lived on Greenhorn Road since 2004. My husband and I intend to live out our final years on the beautiful 40 acres we own. We came to this property, to enjoy the peace, beauty and quality of life we have created for ourselves. This quality of life will come to an end for us if the mine is allowed to reopen in our rural residential area.

Ind 612-2

There have been 83 negative impacts illuminated by the report, with many *significant* enough to stop the project by themselves. We came here to retire and have our custom home be our final stop before turning over the property to our children who will inherit at our demise. If the mine is re-opened, property values will decrease up to 20%. *Who wants to live next to a heavy, extractive, toxic industry?* There are hundreds of my neighbors who will be similarly affected by heavy industry in our midst. Changing the zoning from light industry to heavy would be criminal in the midst of so many people living in the area.

Ind 612-3

Our main concerns are:

- Our water wells will be further dewatered (already our extreme climate change has dried up 3 of our 5 wells), and the likelihood of toxic pollutants used in mining will be dumped into South Fork Wolf Creek destroying the ecosystem.

Ind 612-4

- Our air quality will be further degraded ( already we have poor air quality rating due to our topography and relation to smog from the valley ). The mining project would spew clouds of airborne toxic mining dust and toxic diesel exhaust from heavy trucking. This is an extreme risk to our health.

Ind 612-5

- The noise of operations at the mine will destroy our peace. At our age, we relish the gift of the sounds of trees sighing and the birds singing.

Ind 612-6

- Traffic will be hazardous to negotiate with so many heavy trucking trips on our rural roads to the Centennial site to dump waste rock. Greenhorn Road is a one way in, and one way out road, with hundreds of residents along (and off) it's 7 miles. In a wildfire evacuation, the risk of a deadly outcome for the hundreds of residents along the 7 miles of Greenhorn road would be increased if big trucks were clogging the roadway.

Ind 6112-7

- It does not make sense to reopen a mine that has been closed for 66 years; while in the meantime, our population has grown into the area that has become residential with *hundreds of people living on top of old, toxic, best left alone, 2585 acres of Rise Gold's underground mineral rights.*

Ind 612-8

I believe it is more important to our future health as a community *to not allow hard rock*



↑  
**mining**, which is the single largest source of toxic waste in the United States, back into our now beautiful area that is a tourist destination and desirable place to live.

Sincerely,  
Nancy Rojo  
17150 Greenhorn Road, Grass Valley, CA 95945 (Mailing address: P.O. Box 47, Cedar Ridge,  
CA 95924)  
1-530-274-7336  
email to: [nancytrojo@gmail.com](mailto:nancytrojo@gmail.com)



## **INDIVIDUAL LETTER 612: NANCY ROJO**

---

### **Response to Comment Ind 612-1**

Please see Response to Comment Ind 611-1.

### **Response to Comment Ind 612-2**

Please see Response to Comment Ind 611-2.

### **Response to Comment Ind 612-3**

Please see Response to Comment Ind 611-3.

### **Response to Comment Ind 612-4**

Please see Response to Comment Ind 611-4.

### **Response to Comment Ind 612-5**

Please see Response to Comment Ind 611-5.

### **Response to Comment Ind 612-6**

Please see Response to Comment Ind 611-6.

### **Response to Comment Ind 612-7**

Please see Response to Comment Ind 611-7.

### **Response to Comment Ind 612-8**

Please see Response to Comment Ind 611-8.



**Individual Letter 613**

**From:** Nancy Shanteau <nancy.shanteau@gmail.com>  
**Sent:** Saturday, April 2, 2022 7:37 PM  
**To:** deircommrnts@cea nc.org; Idaho MMEIR  
**Subject:** My opposition to the mine

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<b>Ind 613-1</b>	<p>To whom it concerns:</p> <p>The evidence of mining harms to a place surround us.</p> <p>Mercury poisoning, sink holes, toxic waste byproducts, damage to the ecosystem and all within it.</p> <p>Just now we're all dealing with the destruction of bird habitats during nesting season — big corporations who funnel profits out of the county don't live here and won't care when those problems start coming home. But we'll be living with them. Every day, and every night.</p>
<b>Ind 613-2</b>	<p>There are big problems with the environmental impact report including:</p> <p>The groundwater model has fundamental flaws in the initial start point and baseline data assumptions — all of which throw off the entire analysis.</p>
<b>Ind 613-3</b>	<p>Dealing with mine waste — Asbestos will be a huge and expensive problem that requires far more comprehensive management than described in the report.</p>
<b>Ind 613-4</b>	<p>Greenhouse gas emissions - The report excluded elements that would put the project over an arbitrary threshold limit, but recent climate change goals say the threshold should be "net zero".</p>
<b>Ind 613-5</b>	<p>Cleanup of the toxic, pre-superfund Centennial site that would be used to dump mine waste is not included in the DEIR but is required by the California Environmental Quality Act (CEQA).</p>
<b>Ind 613-6</b>	<p>Missing construction time estimates throw off the entire analysis of noise, traffic, and air.</p>
<b>Ind 613-7</b>	<p>The DEIR incorrectly assesses nighttime noise and underestimates the noise of dumping mine waste near established residential neighborhoods.</p>
<b>Ind 613-8</b>	<p>Air traffic hazards and aesthetic impacts need to be studied further due the likelihood of a moisture cloud plume that could be created by warm, saturated air ventilation.</p>
<b>Ind 613-9</b>	<p>Blasting plans don't follow U.S. mining guidelines that restrict blasting during evening hours.</p>
<b>Ind 613-10</b>	<p>The plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant.</p>





**Ind 613-11**

Meteorological data used to assess the health risk of airborne pollutants doesn't fit Grass Valley's profile or accurately reflect local conditions.

Our peace is priceless.

We can invest in jobs in this county in many more fruitful ways. We have a flourishing tech television and broadcast industry, and could create a jobs magnet by offering TV tech education locally. Just an example of the kind of smart investment that pays long-term returns.

**Ind 613-12**

Let's put our heads together and figure out better options, ones that build a future for us, instead of destroying our present.

Say no and vote no on the Idaho Maryland mine.

Our future is at stake.

Nancy Shanteau  
Grass Valley resident and local business owner.

--

Nancy Shanteau  
Writing, Bodywork, Life, Work, Relationships  
Skills for Change and Somatic Coach, Teacher & Coach Educator  
web: [www.nancyshanteau.com](http://www.nancyshanteau.com)  
join my mailing list: <http://tinyurl.com/h3nji8g>  
Find me on Patreon: <https://www.patreon.com/nancyshanteau>  
tel: 530-273-5170  
cel: 530-205-8440

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Nancy Shanteau  
Writing, Bodywork, Life, Work, Relationships  
Skills for Change and Somatic Coach, Teacher & Coach Educator  
web: [www.nancyshanteau.com](http://www.nancyshanteau.com)  
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tel: 530-273-5170  
cel: 530-205-8440



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## **INDIVIDUAL LETTER 613: NANCY SHANTEAU**

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### **Response to Comment Ind 613-1**

The commenter states that historical mining in the area has led to harmful environmental impacts and that community is currently dealing with the destruction of bird habitats. Note that the DEIR clearly states that mercury would not be used during mineral processing (DEIR, p. 3-25).

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 613-2**

The commenter states that the groundwater model has fundamental flaws and assumptions but does not provide specific reasons and only includes vague references to the "initial start point" and "baseline data assumptions."

The DEIR examined groundwater-related impacts extensively. That analysis may be reviewed at DEIR Chapter 4.8 – Hydrology and Water Quality, the Groundwater Hydrology and Water Quality Analysis (Appendix K.2), the Groundwater Model Report (Appendix K.3), the Preliminary Drainage Analysis (Appendix K.5), and the West Yost Peer Review (Appendix K.7.) The commenter is also directed to Master Response 13 – Historic Hydrogeologic Assessments, and Master Response 14 – Adequacy of Groundwater Model.

### **Response to Comment Ind 613-3**

The commenter states that the DEIR should include more comprehensive management of asbestos but the commenter does not explain how the DEIR is inadequate in this regard. The commenter is directed to Chapter 4.3 of the DEIR which analyzes asbestos in the context of air quality impacts and Master Response 4 - Conservatism of Asbestos Assumptions.

### **Response to Comment Ind 613-4**

The commenter states that the DEIR excluded elements that would cause the project to exceed the GHG emissions threshold, but does not explain what elements were excluded. A net zero threshold for GHG emissions is not required for the project. Please see Master Response 27 - Greenhouse Gas Thresholds.

### **Response to Comment Ind 613-5**

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

### **Response to Comment Ind 613-6**

The commenter states that the DEIR does not discuss construction time estimates which impacts the noise, traffic, and air analyses. Please see Master Response 24 – Project Construction Schedule. As discussed in Master Response 24, the project assumes a compressed construction schedule where many activities overlap to provide the most conservative estimate of air quality, traffic, noise and other impacts. An increase in the duration of construction activities and/or the completion of activities sequentially would serve to reduce estimates of environmental impacts in many areas. As such, the approach taken by the DEIR overestimates impacts as compared to a longer construction schedule with less overlapping activities.

### **Response to Comment Ind 613-7**

Please see Responses to Comments Grp 21-130 and Grp 21-131.



**Response to Comment Ind 613-8**

The commenter states that the DEIR must discuss the potential for moisture cloud plumes and associated impacts to aesthetics or air traffic hazards. Moisture clouds from mine ventilation are not expected to occur and would not cause air traffic hazards or change the significance conclusion of the DEIR for aesthetics. Please see Response to Comment Grp 7-95.

**Response to Comment Ind 613-9**

Please see Response to Comment Grp 21-144.

**Response to Comment Ind 613-10**

The commenter states that the DEIR does not demonstrate that the impacts to biological and aquatic responses would be less than significant, but fails to provide specific reasons why the DEIR is inadequate. The DEIR discusses impacts to biological resources in Chapter 4.4 and impacts to hydrology and water quality in Chapter 4.8.

**Response to Comment Ind 613-11**

The commenter states that meteorological data used to assess the health risk of airborne pollutants doesn't fit Grass Valley's profile or accurately reflect local conditions. The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA.

**Response to Comment Ind 613-12**

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.



**Individual Letter 614**

**From:** Natalie Wengryn <waxgoddess@yahoo.com>  
**Sent:** Monday, April 4, 2022 8:57 PM  
**To:** Idaho MMEIR  
**Subject:** To whom it may concern

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To whom it may concern,

**Ind 614-1**

I have had many years ,leading up to this point, of watching this proposed mine project evolve. I live two miles up Geenhorn Road. My mothers preschool she ran for over 30 years is on East Bennett. Going back in time, to the point when Mr Mossman was just investigating or "looking" in just one of the shafts on East Bennett several years ago, it was apparent to me that this wanted to be somewhat discreet. The tall barrier walls (not being able to see what was going on behind them) struck an interest. I take East Bennett into town every single time, I would drive by there in the morning, mid day and sometimes at midnight or later and the work never stopped. Talking to those homeowners who lived near that site, they informed me what was going on and told me that their homes shook 24 hours a day. Knowing what I know now, I wonder where the contaminated water and debris went those many months of being excreted... and was it treated properly before doing so?

**Ind 614-2**

I am a simple woman. I never did well in science, but I do feel like I am pretty street smart and my gut is telling me something just isn't right here. I am a proud Nevada County native myself, born and raised here I know what this county was built on. My husband's great grandfather was a Nor-Star miner and died in that mine. His grandfather had to take over their dairy farm at a very young age and become a miner himself to support his family. Looking at the big picture, it is apparent to me that it is always the man with the money sitting back reaping all the benefits while everyone else around him puts their lives at risk. I am not going to sit here and copy and paste the same questions everybody else is sending to you. When we first bought our home 12 years ago, it was never disclosed to me (or any of my neighbors or friends that live even closer to the site) that it could potentially re-open. So the fact that I NOW have to disclose this to any potential buyer of MY home, making the value of MY home drop... makes me livid. The fact it could affect my water, quality of life.... We already have to be so careful with the water we already have here from the mining that happened so many years ago. I have filtration systems and do not let my children or family drink any of the water from the tap. I haven't in any home we have lived in in Nevada County knowing what I know. Living so close this should have been disclosed from the very beginning of every home sale or kept a commercial zone so many years ago. Living within 2 miles of the actual site, and only 1000 feet away from where the shafts end, my biggest concern is the water table. We do not have pipe treated water and just had to





- ↑
- Ind 614-3** drill a whole new well. It is baffling they think it will only affect the 30 homes on E Bennett, when the shafts go for miles and miles. When I read information about this project it seems as though they have to dig deeper to get to the actual gold that hasn't been mined. If that is the case, knowing how shafts tunnel farther "out" not "down" concerns me. If that is the case, wouldn't the mineral rights go beyond the thousands of acres? For an 80 year project where will they be in 10, 20, 30 years? I have also heard these horror stories of sinkholes and cave in shafts in Colfax and surrounding areas here. It seems to me going and disturbing extremely old mine-shafts that have been sitting full of rain and our well water for the last 70 years ... that Just disturbing it would cause vibrations that could do this?
- Ind 614-4** Are they going to re build the whole infrastructure down there? I wish that all of these worries I have could be explained to the ACTUAL PEOPLE living in such a close range, so that we don't go down these rabbit holes of worry. Like really, lay it all out on the table to those living right there. I shouldn't have to dig deep into the internet when this shit is happening in my backyard and so close to affect so many quality of lives. This information should be GIVEN to us freely, not some propaganda bandwagon newsletter to "stimulate the economy and bring more jobs" ... that's it, really?!
- Ind 614-5** Having a small business here myself I know that this economy is stimulated and people move here every day with money. Wether retired or working remotely from the city, or growing marijuana. There are so many jobs here ready to hire, so that is a huge cop out to me as well. I really and honestly feel like nobody is being our advocate and it scares me. Yes this will affect this whole county but living so extremely close I am just baffled how this has been handled. Everyone I talk to seems shocked... it's up to five board of supervisors? Its self regulated? Oh that could never be put through! It's not voted on?! And the further I read it doesn't put my mind at ease. Filling the shafts with some kind of man-made paste after being done? Where does the water go after that? What is in this paste can at leach into the water? Is that even environmentally safe? Having to keep sprinklers on the property to keep the amount of dust down does not match up with the fact they're saying it creates minimal dust. Watching and hearing I see him letting every nonprofit use this property, wood chipping and firewood programs, PG&E during the power outages and storms, buys the local fire department a brand new fire truck?! Silently donating to the widening project on 174... To me looks like "remember what I did for you". I could be wrong on some of these things and I would love to be enlightened on this and how exactly this whole process will go down. There are so many facets to this topic, and every time I talk about it I am shocked that it is even on the table. It would be one thing if it was out in the middle of nowhere, but this is in a housing community, my hometown that I am so proud to say...up until this point. Have our backs, be our advocate I am begging you.
- Ind 614-6**
- Ind 614-7**
- Sincerely,  
Natalie Browning





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## **INDIVIDUAL LETTER 614: NATALIE BROWNING**

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### **Response to Comment Ind 614-1**

The comment does not address the adequacy of the DEIR, but rather expresses concerns related to already completed exploratory drilling. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 614-2**

Regarding the commenter's groundwater concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding quality of life concerns, which are outside the scope of CEQA, please see Master Responses 1 and 2. Please also refer to Master Response 7 – Location of Future Mining Areas.

### **Response to Comment Ind 614-3**

For sink hole concerns, please see Master Response 29 – Near Surface Workings.

### **Response to Comment Ind 614-4**

The existing underground workings would be utilized to the maximum extent practicable. As discussed in the Project Description chapter of the DEIR (chapter 3), new underground tunnels and raises would be created as necessary to access gold-quartz veins or provide the necessary underground infrastructure to transport rock and provide ventilation and escape routes. The location, size, and depth of new underground workings would depend on surface and underground drilling and mineral testing. New underground workings, except for the service shaft and new ventilation raise, would be below 500 feet of the ground surface.

### **Response to Comment Ind 614-5**

The commenter expresses concerns related to the use of cemented paste backfill (CPB) in the underground mine. CPB is addressed in detail starting on page 4.8-46 of Chapter 4.8, Hydrology and Water Quality, of the DEIR.

### **Response to Comment Ind 614-6**

The DEIR does not state that the project would create minimal dust. As discussed on page 4.3-65 of the DEIR, as part of implementation of APM-AQ-2, during construction, operation, and reclamation, all exposed soil surfaces would be adequately wetted to ensure that no visible dust crosses the property boundary, except when rains are occurring during construction, operation, and reclamation to reduce surface fugitive dust emissions. In addition, as an alternative to watering, inactive soil piles would be covered to minimize wind erosion. Such measures would be implemented to reduce surface fugitive dust emissions.

### **Response to Comment Ind 614-7**

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 615**

**From:** [Nathan Collins](#)  
**To:** [RCS Public Comment](#)  
**Subject:** Idaho Maryland mine  
**Date:** Friday, February 11, 2022 8:17:14 AM

**Dist 3**

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**Ind 615-1**

Hello,

I am a resident of grass valley and I wanted to say I am against re-opening the mine. The way forward for this county is not by going backwards in time. Not to mention the negative impacts to our air and water. We also do not need a significant amount of noise pollution to fill the air. Please do not reopen this mine. I can't believe we are talking about this in 2022, but here we are. Thank you for your time.

**Ind 615-2**

-Nate Collins

Sent from my iPhone



## **INDIVIDUAL LETTER 615: NATE COLLINS**

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### **Response to Comment Ind 615-1**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Responses 1 and 2. Regarding the general air quality concerns, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. Regarding the general water concerns, please see Chapter 4.8, Hydrology and Water Quality.

### **Response to Comment Ind 615-2**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns and opposition regarding the proposed project. Please see Master Response 1. Regarding the general noise concerns, please see Chapter 4.10, Noise and Vibration. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 616**

TO: Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902  
FROM: Nathan Helm-Burger, Scientist (MA Biological Psychology, MS Neuroscience)  
12810 Woodpecker Way  
Nevada City, CA 95959  
Subject:  
DEIR Comment on: AIR QUALITY AND GREENHOUSE GAS EMISSIONS ANALYSIS  
TECHNICAL REPORT FOR THE IDAHO-MARYLAND MINE PROJECT (IMMP)

April 4, 2023

“Potential cancer risk, as well as chronic and acute health risks would be less than significant without mitigation. However, implementation of MM-AQ-2 would further reduce health risk. Also, since asbestos was found in lab samples from the mine, an Asbestos Dust Mitigation Plan (MM-AQ-3) would be required to limit potential exposure”. (page v, Air Quality and Greenhouse Gas Emissions Analysis Technical Report).

Ind 616-1

Re: I conclude that the most important impact is air pollution because it will endanger people many miles from the mine operations, just as wildfire smoke affects the whole region. While diesel exhaust will have unmitigable negative impacts, it is asbestos and silica that are most dangerous to us. Airborne asbestos can lead to cancer and eventual death.

The DEIR (Appendix E2) finds asbestos in about 32% of drill hole samples representing rock that will be brought to the surface. But, 19 drill holes providing 40 samples cannot represent 2,585 acres of mineral rights (1 sample per 65 acres). That's generalization from insufficient sampling—there's probably more.

Unfortunately, asbestos fibers are very small, approximately 0.5 microns. In this case, being sub-microscopic leads to harm: the asbestos cannot easily be filtered, can remain suspended a very long time in the air because , and penetrates deeply into our lungs.

The EPA's highest filter rating on the MERV scale is 16. This highest rated filter is only expected to filter out 75% of particles 0.3 to 1 microns, such as asbestos fibers. In other words, even using the highest quality industrial filter, it is possible that 25% of the asbestos will pass through. And even that level of filtration is far above what they could afford to do at that scale. Since it should be expected that more than 25% of the asbestos dust will escape mitigation entirely, their impact plan should include an analysis of the airborne spread of asbestos particles and expected dosage levels for the impacted communities.

Ind 616-2

The DEIR mitigations (4.3-2) treat asbestos as dust that can be kept out of the air by spraying water, washing vehicles, tarping the hauling trucks, etc. The proposed mitigations are copied from the CA Asbestos Airborne Toxic Control Measure which is for "visible dust emissions" -- there isn't any Asbestos Dust Mitigation Plan. Asbestos fibers are 1 millionth of a meter long, and can be harmful in quantities too small to be easily noticed in the hazing of the air. Mitigation intended for general rock dust is not sufficient or appropriate for asbestos fibers.

The DEIR does not contain an Asbestos Dust Mitigation Plan (ADMP) and therefore this vital part of mitigation cannot be used to determine DEIR adequacy. Thus, the DIER cannot be certified until action is taken. Quote: "Prior to the initiation of any clearing, grading, or



Ind 616-3

construction activities, Rise Grass Valley Inc. [sic] shall submit an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD)." This plan should be done before the project can be considered for approval.

""Exposure of Sensitive Receptors: Project construction and operation activities would produce TAC emissions due to equipment, haul truck trips, and mining and soil movement. These emissions could result in elevated concentrations of TAC [Toxic Air Contaminants] emissions at nearby receptors, which could lead to an increase in the risk of cancer or other health impacts. In an abundance of caution, the health risk assessment conducted conservatively included emergency generator use based on Pacific Gas & Electric's (PG&E's) recent Public Safety Power Shutoffs during high winds for 24 hours per day, for up to 9 days per year, during construction and operations to reflect potential power outages. Potential cancer risk, as well as chronic and acute health risks would be less than significant without mitigation. However, implementation of MM-AQ-2 would further reduce health risk. Also, since asbestos was found in lab samples from the mine, an Asbestos Dust Mitigation Plan (MM-AQ-3) would be required to limit potential exposure.""

There are also other unaddressed issues such as the need for adequate testing of the 3 million pounds of rock excavated every day.





## **INDIVIDUAL LETTER 616: NATHAN HELM-BURGER**

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### **Response to Comment Ind 616-1**

Diesel exhaust, silica, and asbestos have been analyzed in the Health Risk Assessment included in the DEIR and were found to be less than significant after mitigation. (see DEIR Impact 4.3-2.)

The commenter asserts that sampling for asbestos is insufficient. Please see Master Response 23 - Adequacy of Asbestos Sampling.

As stated on page 10 of Appendix E.2, ASHRAE Standard 52 MERV rating 16 specifies removal of greater than 95% of +0.3-micron particles. The particle size efficiency for particles sizes from 0.3 to 1.0 microns is greater than 75%. However, this fraction of particles size (0.3 to 1.0 micron) represents only a small portion of PM<sub>10</sub> (10 micron) dust; therefore, 25% of asbestos fibers would not pass-through filtration as the commenter asserts. Small fibers of naturally occurring asbestos are also less likely to become airborne as they would be enclosed in dust particles and therefore not be counted as asbestos in an air sample. Please see Master Response 22 - Conservatism of Asbestos Assumptions.

### **Response to Comment Ind 616-2**

Small fibers of naturally occurring asbestos are also less likely to become airborne as they would be enclosed in dust particles and therefore not be counted as asbestos in an air sample. Please see Master Response 22 - Conservatism of Asbestos Assumptions.

The minimum requirements of the Asbestos Dust Mitigation Plan are provided in Mitigation Measure 4.3.2. This plan must be approved by the Northern Sierra Air Quality Management District before commencement of clearing or grubbing. The preparation and approval of the ADMP is not required during the CEQA process. ADMPs are typically prepared and approved after the CEQA process is complete. CEQA regulations state that compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (see CCR § 15126.4.) Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to NSAQMD for review and approval. The ADMP has minimum requirements as described in the mitigation measure. The requirements for the ADMP are regulated by the Asbestos ATCM for Construction, Grading, Quarrying and Surface Mining Operations [17 CCR 93105]). Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

### **Response to Comment Ind 616-3**

The commenter states that adequate testing of rock proposed to be excavated daily is unaddressed in the DEIR. However, testing of rock is thoroughly discussed and analyzed in the DEIR. See chapters 4.3, 4.6, and 4.8 of the DEIR.



**Individual Letter 617**

**From:** [Nathan W.](#)  
**To:** [hckofsupervisors](#)  
**Subject:** Please vote against the mine  
**Date:** Friday, February 18, 2022 9:26:04 AM

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**Ind 617-1**

Hey there, wanted to share some thoughts on the mine. As a permanent resident of Nevada County I feel like the proposed mine is a bad idea.

The noise is discussed below. The impacts to air and water outlined in the EIR are unacceptable.

**Ind 617-2**

Also: The traffic analysis has some significant and unavoidable impacts that are reported as such in the DEIR. The traffic effects will be horrible for a long time. Also, at my initial glance, there is no clear analysis of the increase in traffic along segments of highway 49, which appears to be a flaw in the analysis.

**Ind 617-3**

The recently published DEIR for the proposed reopening of the old Idaho Maryland mine needs careful scrutiny.

Taken at face value, it concludes that the project would have no impact on the community that could not be mitigated.

The report was written by Raney Associates, a reputable firm chosen by the County, but it is based on language and measurement values provided to it by Rise Gold, and is correct in its conclusions only to the degree that that language and those measurement values are correct. Rise Gold has clearly chosen the language and measurement values to reflect the best possible outcome. Consequently, the real-life conditions would likely be quite different from the conclusions in the DEIR. Evaluating the level of impact should be based on worst case conditions, not best possible conditions.

**Ind 617-4**

Examples follow:

The ambient noise levels used in the study are currently four to five years old. Since the operations at issue will not start occurring for several years in the future after building construction and tunnel re-construction have been completed, these noise levels will likely not reflect the actual ambient noise at the time operations actually start, so the conclusions are questionable.

**Ind 617-5**

Noise is referenced with respect to 1) the source, and 2) the distance to "The Nearest Receptor". According to the County General Plan, Table 4.10-4 notes:

"[The noise] standards shall be measured only on property containing a noise sensitive land use as defined in Policy 9.8 and may be measured anywhere on the property containing said land use. However, this measurement standard may be amended to provide for measurement at



↑ the boundary of a recorded noise easement.”

Rise Gold has chosen to measure and compute noise levels at what they call ‘The nearest receptor’, which in the case of the multi-acre parcels surrounding the mine operations, is the residence on the property, located at the greatest distance from the mine operations. To provide a realistic level of the impact on the property, those measurements and computations should be made at the property boundary, rather than the far end of those properties.

**Ind 617-6** The study describes in detail how the sound mitigation by terrain and ground cover will contribute to the mitigation of sound in the local neighborhood, and relies on these values for its conclusions, but does not address the time when the engineered fill rises above the surrounding foliage and subjects the neighborhood to the direct, unobstructed noise of the fill and compacting operation. And incidentally, puts the subsequent use of the property (probably an industrial park) 93 feet higher than it now is, an altitude that will block the now unobstructed view of the surrounding parcels.

**Ind 617-7** The DEIR also says: “Assuming a bulldozer, grader, excavator, front-end loader and compactor were operating concurrently at the Brunswick and Centennial Industrial Sites during site preparation, the combined noise exposure from the effective noise center of those operations would be 85 dBA Leq and 85 dB Lmax at a distance of 50 feet from the operations. However, the earthmoving equipment would be at various locations on the project sites rather than grouped in a small portion of the sites. To provide a conservative but reasonable assessment of project construction noise generation at the Brunswick and Centennial Industrial Sites, it was assumed that all of this equipment could be operating concurrently, but that the equipment would be spread out over the sites during the site clearing/construction operations. As a result, average noise levels were predicted for the Brunswick and Centennial Industrial Sites preparation activities assuming the noise sources were distributed throughout the sites, whereas maximum noise levels were predicted based on the closest proximity of the equipment to the sensitive receptor locations.”

This combined sound level would also be true of the later fill and compact operations at the Centennial and Brunswick sites, therefore this seems is a false assumption, since these machines work jointly to accomplish their task, and would sometimes be operating in close proximity.

The DEIR is full of statements that use “it is assumed” and “is projected to be” as given fact in arriving at their conclusions.

These are red flags.

**Ind 617-8** Additionally, the suggestion that both the average and the maximum sound levels would be the same, 85 dBA, says that the noise would be ongoing and continuous from 6AM to 10PM 7 days a week. Acceptable daytime noise levels of 75dBA would still be like standing next to a busy freeway. This is a major change to a quiet neighborhood, even if it lies within the County’s defined noise limits.

Sound level calculations for the DEIR Tables are based on values for construction noise from The FHWA Roadway Construction Noise Model (RCNM), and shown in Table 4.10-10. These values differ substantially from sound levels shown in the Noise Navigator Sound Level Database, published by the University of Michigan Department of Environmental Health Science.

For example, where the RCNM shows Compactor and Front End Loader sound levels at

↓





Ind 617-9

80dBa, the Noise Navigator chart lists them as 92 and 93dBa. An Earth Scraper in Table 4.10-10 is listed at 85dBa. In the Noise Navigator chart, it is 107 to 111 dBa. The noise level values on the Noise Navigator chart are twice and four to five times those on the RCNM chart used by Rise.

This calls into question the integrity of the analysis, since the actual machines to be used, the true sound levels of those machines, the real numbers of those machines in use at any given time, and their locations around the working locations at any given time are not actually known.

The DEIR describes a sound monitoring plan to evaluate the mitigation results of the operation. It says:

“If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed.”

At this point, Rise will have sunk several million dollars into construction and development costs prior to starting operations. Are we to believe that they will just shut down until they can solve the problem, or will they continue to operate and pay fines levied as ‘the cost of doing business’? These issues must be resolved before any permit is issued!

For those curious to know what the sound levels in your own lives are, there are several excellent sound meter apps available for your phone. Search ‘noise level meter’. Although I have a professional sound level meter, I find the NOISH Sound Level Meter to be surprisingly accurate.

Because calculating cumulative sound levels involves dealing with the logarithmic dB scale, the online tool NOISE CALCULATOR may be handy:

[\[https://noisetools.net/decibelcalculator\]\(https://noisetools.net/decibelcalculator...\)](https://noisetools.net/decibelcalculator)

All the info above to be credited to Robert Hubbard

So for all these reasons including air water noise traffic and other issues I ask you to please vote against the mine.

Thanks.



## **INDIVIDUAL LETTER 617: NATHAN W**

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### **Response to Comment Ind 617-1**

The commenter's opposition to the project is noted for the decision-makers. No specific comments are provided related to the adequacy of the DEIR and no further response is warranted. Please see Master Response 1.

### **Response to Comment Ind 617-2**

The commenter references the project's anticipated significant and unavoidable impacts related to traffic. The commenter's opposition to these impacts is noted for the decisionmakers. Regarding the supposed increase in traffic along segments of Highway 49 and where to find it in the DEIR; as stated in the DEIR, the quality of traffic flow is typically governed by the operation of major intersections and the daily volume of traffic along the roadways. (DEIR 4.12-1.) Many of the Study Roadway Segments either directly connect to SR 49 or provide access to SR 49. As explained on page 4.12-16 and 4.12-17, while levels of service were used to demonstrate County roadway impacts consistent with the General Plan, CEQA requires a Vehicle Miles Traveled approach, accounting for the number of vehicle trips generated and the length or distance of those trips. This includes both commuting employees, fill trucks and other vehicles using VMT as the primary metric used to identify transportation impacts under CEQA. (DEIR 4.12-28.) Table 4.12-9 details the Project Trip Distribution on every route, including SR 49 for both average daily trips and maximum daily trips for the Brunswick and Centennial Industrial Sites for employee traffic, engineered fill trucks and other vehicles.

### **Response to Comment Ind 617-3**

Commenter questions the accuracy of the data used for the DEIR. Although Bollard Acoustical Consultants, Inc. (BAC) has prepared numerous CEQA-level DEIR noise analyses directly for Raney over the years, the commenter is correct that the noise study prepared for this project by BAC was completed under contract with the applicant, not directly for Raney. However, in such cases it is common practice for the EIR preparer (Raney), to retain a qualified, third-party, consulting firm to conduct a thorough peer review of technical studies provided directly by the applicant. For this project, Raney retained Saxelby Acoustics to conduct such a peer review of BAC's noise study. The independent peer review is described on page 4.10-26 of the DEIR. The Saxelby peer review identified areas of the original noise study where additional detail or analysis was recommended. The noise study was revised in response to the peer review comments and suggestions, and the revised noise study was reviewed again by Saxelby Acoustics and determined to be adequate.

This comment is incorrect as all ambient noise level data collected for this project was reported without alteration and represent actual baseline ambient conditions at the nearest sensitive receptors to the noise-generating areas of the project. In addition, all assumptions regarding proposed operations and the noise-generation of those operations were clearly presented in the DEIR noise study (see DEIR Appendix L). Because the project would be conditioned to require extensive noise-compliance testing upon project start-up and thereafter, and required to implement additional sound control measures if the applicable noise standards are exceeded, utilizing unrealistic or understated assumptions to assess potential noise impacts for project noise sources would be counter-productive. CEQA does not require evaluation of absolute worst-case conditions or worst-case scenarios. If this were the case, all new residential developments within the State of California would be required to implement extensive noise mitigation measures (i.e., very tall sound walls around neighborhoods), for atypical noise conditions such as the passage of a very loud motorcycle group adjacent to a proposed residential development on a Sunday





afternoon, for example. Similarly, CEQA studies should also not be prepared using best-case conditions. An evaluation of the typical noise generation of the project is required, not absolute worst-case or best-case conditions. For this project, the goal was to identify noise impacts associated with typical operations using reasonably conservative assumptions.

#### **Response to Comment Ind 617-4**

The commenter states that the noise data is too old to use. As the CEQA Guidelines make clear, ordinarily the appropriate baseline will be the actual environmental conditions existing at the time of the Notice of Preparation. The noise studies in question were conducted over time to give complete information leading up to the Notice of Preparation, which was publicly issued on July 17, 2020. Given the exponential nature of the decibel scale, a considerable change in traffic volume is required prior to an appreciable change in ambient noise conditions occurring. Specifically, a doubling of traffic volume is required to achieve a 3 dB change in ambient conditions. Because traffic volumes rarely double within the span of 20 years, and because the baseline ambient noise environment in the project vicinity is defined almost exclusively by local traffic, minor changes in traffic volumes in the past 4-5 years would result in negligible changes in ambient noise conditions. It should be noted that the evaluation of the project's noise impacts is directly related to baseline ambient conditions. As a result, comparison of project's noise generation against a lower ambient condition provides the greatest protection for noise-sensitive receptors than comparison of project noise generation against a higher ambient condition. Although no substantive changes in ambient conditions are believed to have occurred since the completion of the ambient surveys for this project, had such minor changes occurred the ambient data used to establish the project standards of significance in the project DEIR would result in a conservative assessment of the project's noise impacts.

#### **Response to Comment Ind 617-5**

The commenter suggests noise monitoring at the property's edge instead of at the nearest receptor as suggested by the DEIR and the County General Plan. DEIR Table 4.10-4 was included as Table 5 in the noise analysis prepared by BAC for the project (DEIR Appendix L). As a result, the noise study preparers were familiar with the specific requirements of the County's General Plan Noise Element. The intent of the noise study was to evaluate potential noise impacts only at properties containing noise-sensitive land uses and at locations on those properties where noise-sensitivity actually exists, not at the extreme edge of the property containing the noise-sensitive use. Nonetheless, Figure 4.10-2 of the DEIR clearly indicates that the receptors evaluated in this study are very close to the Brunswick site boundaries, not at the "far end" of the properties as asserted by the commenter. Two exceptions occurred at Receptors 1 and 2 located near the Centennial Site where the residences are set back from Idaho-Maryland Road. Had the receptors on these properties been placed at the southern boundary of the sites, immediately adjacent to Idaho-Maryland Road, ambient conditions for those receptor locations would have been substantially higher. Because the noise standards are tied to ambient conditions, the result of locating the receptors at the south end of those properties would be much higher standards of significance for Receptors 1 and 2. The higher predicted noise levels associated with the project (due to the closer proximity of the receptors to the Centennial site), would have been more than offset by the significantly higher ambient conditions at the locations adjacent to the roadway. As a result, the finding of a less than significant noise impact at those receptors would not have changed.

#### **Response to Comment Ind 617-6**

Commenter suggests that an analysis was not made of the engineered fill at elevation later in the project timeline. On the contrary, the ultimate elevations of the engineered fill areas were included



in the three-dimensional noise modelling conducted for the environmental noise analysis, as described on page 6, last paragraph, of the Noise and Vibration Analysis. As a result, the condition referenced in this comment was accounted for in the DEIR impact assessment.

### **Response to Comment Ind 617-7**

The commenter questions the adequacy of the County's defined noise limits and ordinance and the DEIR's use of scientific modeling. Because maximum noise levels typically result when equipment is operating at the nearest positions to sensitive receptors, the noise evaluation prepared for this project appropriately analyzed impacts relative to maximum (L<sub>max</sub>) noise level standards while the equipment would be operating at the closest positions relative to residences. However, given the variability of the locations of mobile equipment while operating on the sites, average (L<sub>eq</sub>) noise levels associated with the operations of such equipment are similarly variable. As a result, an evaluation of potential noise impacts conducted by placing all of the equipment at the closest positions to the nearest residences would be both atypical and would result in overstatement of project's average noise generation. While it is true that heavy equipment will sometimes operate in close proximity to the engineered fill boundaries, it would be incorrect to assume that all of the on-site heavy equipment would be simultaneously operating at the extreme edges of the site nearest the sensitive receptors. As mentioned above, CEQA does not require analysis of a worst-case scenario.

It is both a necessity and common practice to conduct modelling of a project's likely noise generation prior to the commencement of operations at a proposed project site. This is because those operations and equipment used to conduct those operations would not be operating until such time as the project is approved and operations at the site commence. As a result, it is necessary to utilize both reasonable and appropriate assumptions in that modelling. Furthermore, by virtue of the fact that project noise levels are modelled, the results are, in fact, "projected". The authors of the DEIR noise analysis have modelled the potential noise impacts associated with projects for over 30 years, including multiple EIRs which have regularly and routinely been certified by the local jurisdiction as being adequate per CEQA guidelines. Each of those studies utilized scientific assumptions to project noise levels at sensitive receptors, with mitigation being required in each case where significant noise impacts were identified. The same approach was taken with this project. Impacts were identified for some aspects of this project and related noise mitigation measures identified. Although some assumptions were required for the analysis of impacts for this project due to the fact that various options exist for the selection of certain equipment types, the majority of the modelling was based on information provided by the Project Applicant where specific information pertaining to the noise generation of the proposed equipment was known. Because the project will be conditioned to require extensive noise-compliance testing upon project start-up and thereafter (a recommendation made by the noise study preparers), and because the project will be required to implement additional sound control measures if the applicable noise standards are exceeded upon commencement of those operations, utilizing unrealistic or understated assumptions for project noise-generation would be counter-productive to the objectives of the analysis. Approval of the project does not waive the applicability of the County's noise standards or the applicant's responsibility to satisfy those standards and in order to operate, the project must comply with those standards.

### **Response to Comment Ind 617-8**

Commenter would rather use the Noise Navigator Sound Level Database published by the University of Michigan instead of the Federal Highway Administration's (FHWA) approved national model. It is important to understand that maximum noise levels received at a sensitive receptor seldom result from the simultaneous generation of maximum noise levels from multiple types of



heavy earthmoving equipment. As a result, there is often very little difference in measured average and maximum noise levels associated with the operations of heavy earthmoving equipment. In addition, the average noise generation of heavy equipment is a function of the duration of the hour in which the equipment is operating, the noise generation of the individual equipment types, and the distance between the nearest sensitive receptor and that equipment.

The Roadway Construction Noise Model (RCNM) is the Federal Highway Administration's (FHWA) approved national model for the prediction of construction noise. The RCNM is a national model based on the noise calculations and an extensive construction equipment noise level database. The basis for the national model is a spreadsheet tool with predictions originating from Environmental Protection Agency (EPA) noise level work, which utilizes an "acoustical usage factor" to estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation. The noise levels listed in the RCNM database represent the A-weighted maximum sound level (L<sub>max</sub>), measured at a distance of 50 feet from the construction equipment. By comparison, the Noise Navigator Sound Level Database does not differentiate between whether the sound levels are presented in terms of maximum, average, or some other acoustical descriptor. Furthermore, many of the sound levels presented in the Noise Navigator database do not include the distance at which the reported levels were measured, making the data unusable for the purposes of evaluating construction noise impacts. Many of the reported levels are at the position of the equipment operator, which has no bearing on the evaluation of construction noise at the nearest residences. The Noise Navigator's spreadsheet reports noise levels ranging from 82 to 102 dBA for front loaders, but no distances are provided for those reported levels. As such, they cannot be compared against the extensive database of equipment noise levels reported at a reference distance of 50 feet in the RCNM database. In addition, there is no information provided at the Noise Navigator website regarding the adequacy of the equipment used to measure the noise levels, the experience of the individuals conducting the noise level measurements, or the conditions present when the noise surveys were conducted. Because the Noise Navigator website states only that, "The tabled values are primarily A-weighted sound levels, as opposed to time-weighted average levels or Leq's. To determine exposures, the user will have to factor in the total exposure time as well as the actual sound level that is present at the ear", and "The values are for representative sources at typical distances. When available, the distance at which the measurement was recorded is listed in the appropriate column". However, no distances are provided for any of the Front End Loader noise level data included at the Noise Navigator Site. Finally, no distances were provided for 5 of the 7 reported sound levels for "Earth Scrapers" at the Noise Navigator site and the distances provided for the other two sites ranged from 3 to 20 meters. Due to the inconsistency and lack of supporting information for the data provided at the Noise Navigator site it cannot reasonably be relied upon for use in predicting construction noise impacts. By comparison, the FHWA RCNM is industry-recognized as a reliable prediction tool for construction noise and has been used in numerous CEQA EIR evaluations prepared by the authors of this project's noise evaluation which have been certified as adequate.

### **Response to Comment Ind 617-9**

The commenter expresses skepticism that violation of the County's Noise Ordinance can result in stopping the project and again suggests using a phone noise calculator. First, Mitigation Measure 4.10-3 of the DEIR is legally binding and enforceable by the County. This mitigation measure requires the mining operation to cease until additional engineering controls can be implemented, as needed. The mine will not be allowed to continue operating until such time that the applicant provides proof demonstrating the operational noise levels comply with the County noise level standards.



Commenter is correct that smart-phone sound level meter (SLM) applications are becoming increasingly popular. And while such applications can provide data which may match data collected by state-of-the-art sound level meters under certain circumstances, care must be taken in interpreting and understanding the results provided by such applications as there are many circumstances when such applications will provide erroneous information. For example, smart-phones do not have a wind-screen, cannot be calibrated, and the microphone has a very small diaphragm, thereby severely limiting the frequency response of the SLM applications, introducing pseudo noise from wind, and inaccuracies in general. Furthermore, because SLM applications do not meet either Type 1 or Type 2 requirements without the use of an external, calibrated, microphone (verified at website: <https://www.cdc.gov/niosh/topics/noise/app.html>), they do not meet American National Standards Association requirements for accuracy (ANSI S1.4). As a result, such applications should be used with care and an understanding of the limitations of the application.

BAC is familiar with this site and concurs with the commenter that this site provides accurate decibel computations.





**Individual Letter 618**

**From:** [Nathan W.](#)  
**To:** [bcobfsupervisors](#); [Heidi Hall](#)  
**Subject:** The mine EIR is woefully incomplete  
**Date:** Friday, March 25, 2022 7:50:40 AM

Dist 1

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Ind 618-1

I wasn't able to attend the meeting in person but have previously shared via e-mail my concerns with the EIR.

Here is another: it has come to my attention that Hydrology experts have found serious flaws in the analysis included in the Draft Environmental Impact Report for the Idaho-Maryland Mine, raising major concerns about negative impact on wells and the area's groundwater in a time of drought.

To be fair, since I live north of Nevada City in district one, I probably don't have to worry about my well! But we are a community, we are all in this together, and when things go wrong, we are all going to be impacted.

And things will go wrong. That's why we have this process. To make sure that is taken account of with mitigation steps in place.

Ind 618-2

The EIR says the mining company will address well issues..... but ONLY for the 30 wells identified in the report. It does not acknowledge ANY risk for wells beyond that, and there lies the rub. It also does not actually set aside money in escrow for mitigation, leaving them the easy out they have used before by declaring bankruptcy when the issues exceed their optimistic projections.

If those wells fail, there are ZERO mitigations proposed of any kind. Fractured rock hydrology is a very imperfect science. There is no way to say with certainty that other homes won't be affected. Those other homes need to have protections too.

This plan doesn't even propose well monitoring for those other homes, which means that if something fails, there would be NO way for homeowners to prove that the mine was at fault and they would have to bear the costs and timeline themselves.

It currently takes years to install NID water so that means those homeowners would be out of luck for a very long time. And to replace wells across all of Rise Gold's mineral rights area would literally cost millions. Personal costs for each homeowner would be in the 10's of thousands. This is a HUGE risk for both homeowners and the County.

Ind 618-3

But what is worse, this company tends to pull up stakes when bad things happen. They just file bankruptcy and pack up and leave and don't honor any of their agreements. They did this on one of their last projects in Canada





↑ It's not that I don't trust Rise Gold, it's just that they haven't lived up to previous agreements, and left the community holding the bag for the cleanup of a project that they were supposed to do. And even if they pay, the hardship in the process and impact to the community greatly outweighs the benefit to us.

I absolutely, unequivocally DO NOT support re-opening the Idaho-Maryland mine. Nevada County is in tremendous need of brave stewardship that can provide a strong, healthy future for today and for decades to come. Rise Grass Valley's plan to build a mismanaged, short-sighted mine that badly disrupts neighbors and our natural environment while creating irreversible harm for at least 80 years is a crossroads to revitalize our local priorities. Re-opening the mine assumes that their employees want unsafe, short-term careers with a negative impact that is immeasurable, including devastating pollution. The mine will spur a bottleneck of massive truck traffic, intolerable noise, increased dust magnitudes, damage to both our area water sources and private wells combined with depleting electric power resources in a drought region. THIS PROJECT IS UNSAFE and significantly affects the health, security, and peace of Nevada County residents and their families and will disrupt locals' prosperous lives.

Rise Grass Valley has an outdated, unwanted, self-serving project for Nevada County. I URGE THE BOARD OF SUPERVISORS AND OTHER COUNTY OFFICIALS TO PROTECT OUR LOCAL COMMUNITY BY STRONGLY CONDEMNING THE RE-OPENING OF THE IDAHO-MARYLAND MINE.

Thank you for your time.

—Nathan off Rock Creek Road.



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## **INDIVIDUAL LETTER 618: NATHAN W**

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### **Response to Comment Ind 618-1**

The commenter claims that hydrology experts have found flaws in the analysis in the DEIR. However, the commenter does not describe these supposed flaws, identify the experts, nor reference any alternative studies. The project's technical studies related to hydrology were prepared by experts in the field of hydrology and peer reviewed by a third-party consultant to ensure adequacy. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model.

### **Response to Comment Ind 618-2**

The commenter incorrectly characterizes the mitigation measures provided in the DEIR to address potential impacts to groundwater supplies and domestic wells in the project area. Mitigation Measure 4.8-2(c) on DEIR page 4.8-68 requires the applicant to implement a Well Mitigation Plan for the 7 wells which are expected to be adversely impacted by proposed dewatering according to the groundwater modeling conducted for the project, as well as 23 other properties along E. Bennett Road. In addition, Mitigation Measures 4.8-2(a) and (b) require the applicant to implement a groundwater monitoring program and to provide a comparable alternative water supply should project dewatering significantly impact any additional wells in the area not previously identified. Implementation of these measures would be financed by the Project Applicant.

Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

With regard to the project's financial assurance mechanism, the comment is noted for the decisionmakers, and the commenter is referred to Master Responses 1 and 2.

### **Response to Comment Ind 618-3**

The commenter's opposition to the project is noted for the decisionmakers – Please see Master Response 1. With regard to the Project Applicant and previous mining projects, the commenter is referred to Master Response 3 - Operator Responsibility. With regard to the project's effect on residents' peace and quality of life, the commenter is referred to Master Response 2 - Social and Economic Impacts.

The commenter broadly lists several environmental concerns but does not provide any specific comments. Each of the environmental topics raised is evaluated in the appropriate chapter of the DEIR.



**Individual Letter 619**

Matt Kelley,  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 94959-8617

Mr. Kelley:

Rise Grass Valley's proposal to reopen the Idaho-Maryland Mine will pump \$38 million in direct payroll into our local economy by creating 312 jobs that today do not exist in Nevada County. Who among the Board of Supervisors will be foolish enough to say no to that idea?

Nevada County is in a recession. Our average wage is \$45,000 a year, \$23,000 lower than the statewide average. They are offering an average annual wage of \$94,000 (NOT INCLUDING BENEFITS), and two-thirds of the new hires can come from existing Nevada County residents.

Think about what that means for the small businesses in this county. The benefits to the local building and contracting industry are obvious, but what does it mean to an independent restaurateur in Grass Valley or a small shop owner in Nevada City? To have 15-20 more customers a week because there are more people with strong incomes working locally. What does it mean to the school districts to have an influx of tax base and new students rather than worrying about school closures and budgets being cut?

My company has worked with Rise Grass Valley, and we're confident in their plan. I urge the Board of Supervisors to support jobs and economic growth in the county by supporting the Idaho Maryland Mine and recapturing our strong history of responsible mining locally.



Neal Siller  
Siller & Siller  
PO Box 430,  
Penn Valley, CA 95946

**Ind 619-1**



## **INDIVIDUAL LETTER 619: NEAL SILLER**

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### **Response to Comment Ind 619-1**

The comment does not address the adequacy of the DEIR, but rather expresses general support for the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 620**

**From:** Nelson Foster <graypine2@hughes.net>  
**Sent:** Monday, April 4, 2022 6:04 AM  
**To:** Idaho MMEIR  
**Subject:** Idaho-Maryland Mine

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Friends,

I want to join fellow Nevada County property owners registering concern about the EIR presented by Rise Gold pursuant to its application to reopen the Idaho-Maryland Mine.

Professional reports that support mines — Siskon Gold, in my neighborhood — are custom-made to understate risks and overstate benefits and protections. A lot of people better qualified than I have given the County many reasons to read the Rise Gold argument skeptically. I'm particularly concerned about dewatering and greenhouse gas emissions.

Please rule against reopening the Idaho-Maryland Mine.

Thank you,  
Nelson Foster  
17973 Tyler-Foote Rd., Nevada City, CA 95959

**Ind 620-1**





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## **INDIVIDUAL LETTER 620: NELSON FOSTER**

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### **Response to Comment Ind 620-1**

The comment expresses a general opinion that the DEIR understates the risks and overstates the benefits and protections of the proposed project, but does not provide specific examples that would allow for a detailed response.

Pursuant to the requirements set forth by CEQA Guidelines Section 15121, the DEIR assesses all potential project impacts that could occur to all environmental issue areas required for analysis under CEQA. As part of such assessment, the DEIR evaluates the proposed project's consistency with applicable policies, regulations, and standards established at the federal, State, and local levels and incorporates analyses from the County's expert consultants, which includes independent peer reviews of the applicant-provided reports. Where potential impacts are identified, the DEIR sets forth mitigation measures to reduce the severity level of the identified impacts to the extent feasible and discloses the level of impact that would occur subsequent to incorporation of mitigation. As such, the analysis within the DEIR is adequate and meets the requirements set forth by the CEQA Guidelines. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.

Regarding the commenter's general dewatering and greenhouse gas emissions concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 27 – Greenhouse Gas Thresholds.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 621**

**From:** [Nicki Hansen-Dix](#)  
**To:** [RCS Public Comment](#)  
**Subject:** To be read at BOS meeting: Deny Rise Gold mining operation  
**Date:** Tuesday, January 18, 2022 4:52:50 PM

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**Ind 621-1**

My name is Nicki Hansen-Dix. I am a retired architect and project manager for both county and Federal governments. I reviewed and made decisions based on EIR findings and managed small and large design and construction projects from concept to completion. I live just off Bennett in Grass Valley and so have a personal stake in the impacts of this proposed project.

**Ind 621-2**

I urge you to deny the opening of this mine. The negative effects regarding water supply and contamination alone should be enough to convince you of the harm to the environment and the community. But reduction in already poor air quality, the addition of noise pollution and disruption to the rural life of residents of our county need also be considered.

**Ind 621-3**

In addition, with the history of unmitigated pollution and damage caused by the entity proposing this project, this company would never have been approved for any of the government projects I managed. Their past performance raises huge red flags for the health and safety of our county. Mining has historically damaged and poisoned much of our county. Please do not allow this to happen again. Do not let this project go forward.  
Thank you for your consideration.



## **INDIVIDUAL LETTER 621: NICKI HANSEN-DIX**

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### **Response to Comment Ind 621-1**

The comment does not address the adequacy of the DEIR, but rather summarizes the commenter's qualifications.

### **Response to Comment Ind 621-2**

The comment does not directly address the adequacy of the DEIR. Regarding water supply concerns, the commenter is referred to Chapter 4.8, Hydrology and Water Quality, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding contamination concerns, please see Chapter 4.7, Hazards and Hazardous Materials, as well as Master Response 8 – Mine Waste Characterization. Regarding the general noise concerns, please see Chapter 4.10, Noise and Vibration. Regarding general air pollution concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, as well as Master Responses 18 – Air Quality Thresholds. Concerns related to quality of life are outside the scope of CEQA - please see Master Responses 1 and 2.

### **Response to Comment Ind 621-3**

The comment does not address the adequacy of the DEIR. Regarding operator concerns, please see Master Response 3 – Operator Responsibility. The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 622**

Matt Kelley, Senior Planner  
Nevada County Planning Department  
Idaho.MMEIR@co.nevada.ca.us

Comments on Draft Environmental Impact Report for proposed reopening of Idaho-Maryland Gold Mine

My name is Nicki Hansen-Dix. I am a retired architect having worked as an architect and project manager for federal and county governments (General Services Administration Design and Construction Division in San Francisco and Los Angeles, Sonoma County Architects Office and Placer County Architects Office). I have lived in Nevada County for twenty years. My parents lived here beginning in 1979. My great-great-grandparents were married near Chalk Bluff in this county and my great-grandfather was born here. I now live at 115 Union Jack Street, #38, Grass Valley, in the zone that is within 1 - 1,000 feet from the Idaho-Maryland mine mineral rights, less than two miles from the mine property and less than one-half mile from the Centennial site.

I attended a portion of the meeting on March 24th and heard many of the issues I have with the DEIR report addressed there. In light of that, I will not detail all of my own concerns here knowing others have already gone on record to communicate those to you. But I agree with the consensus that this DEIR is inadequate:

**Ind 622-1**

- in the scope of the impacts (e.g., where does it fully address the changes to quality of life or impact on community mental health that will be caused by this project),
- in the suggested mitigations that miss entire elements of an impact (e.g., the proposed NID extension impact on property owners described below), or
- by downplaying impacts (e.g.,
  - admitting temporary noise levels 4.10-1 will be Significant and Unavoidable (SU) for construction of potable water line, but permanent increases of excess noise levels of the project 4.10-3 will be Significant (S) mitigated to Less Than Significant (LS) despite 24/7 construction and mine operations involving explosions, rock crushing and other mechanical and equipment noise, and inescapable truck traffic, or
  - determining impacts to be LS and therefore no mitigation needed when impacts are actually significant (e.g., creating a new source of substantial light or glare associated with the proposed project 4.1-3, which is definitely a larger than LS impact in a rural area with a new 24/7 operation).

I will address aspects of the NID pipeline, noise, air quality, housing, emergency egress in evacuations, climate change and carbon offsets.

**The proposal to extend NID pipeline to potentially impacted well owners, 4.8-2(c)**

I am only pointing out two of the issues relating to the proposed NID line extension to well owners. And as the NID representative who spoke at the March 24th meeting said, the number of potential wells impacted will far exceed those listed in the DEIR,

**Ind 622-2**

- Not addressed is the loss of the ability to live "off the grid" by having an independent source of water. One reason for living rurally is the commitment to sustainable living. Providing NID access does not solve this issue. Land owners with wells have already worked and paid for their water supply and should not be forced to depend on public infrastructure.
- Many people do not consider "treated" water to be the healthiest option for themselves or that of their animals/stock or landscape/crops/gardens. This is illustrated by the large number of

Page 1 of 6





Ind 622-3	<p>households using filtering systems for tap water, from single filtering pitchers to whole house filtration systems, in order to eliminate chemicals such as the chlorine routinely added to the public water supply.</p> <p><b>*Can a property owner who declines NID connection opt to have their well deepened at Rise's cost?</b></p> <p>An observation regarding <b>Figure 4.8-13 Potential Expansion of Future Mine</b>: I find it interesting that potential mining expansion extends significantly beyond the mineral rights boundary in several areas.</p>		
Ind 622-4	<p><b>Noise and Vibration 4.10</b> as it will impact residences, businesses, wildlife, livestock, pets, families, and vegetation within and near the proposed mine site, along the truck route to the Centennial site—including the Whispering Pines Businesses Park and nearby businesses such as Peaceful Valley Farm &amp; Garden Supply<sup>1</sup>—and also the truck routes to and traveling along SR 20/49 extending throughout county and state.</p> <p>Despite the fact that Nevada County Zoning Ordinance exempts construction activities from the noise standards, and despite DEIR's tables listing decibel levels being within allowable ranges, and despite five plus six years being considered "temporary", the unrelenting seven-day-a-week noise onslaught will cause damage to the health of humans, pets, livestock and wildlife. This impact to health cannot be mitigated. Allowing this project to proceed will cause harm to several generations over the 80-year period of this project. See Note 1 at the end of these comments for some of the specific detrimental health effects caused by noise.</p>		
Ind 622-5	<p><b>4.10-1 Generation of a substantial temporary increase in ambient noise levels ... even with the implementation of mitigation, the impact would be considered <u>significant and unavoidable</u>. ...</b></p> <p><b>4.10-2 Generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, due to fill placement, compaction, off-site traffic, and related activities. Based on the analysis below, with the implementation of mitigation, the impact is <u>less-than-significant</u>.</b></p> <p><i>Placement and compaction of engineered fill at the Centennial Industrial Site would occur over approximately five years, and placement and compaction of engineered fill at the Brunswick Industrial Site would occur over approximately six years. Movement of fill from the Brunswick Industrial Site to the Centennial Industrial Site would involve an increase of heavy truck traffic along off-site roadways, which could increase local noise levels. The aforementioned activities would lead to a temporary increase in ambient noise levels in the project vicinity</i></p> <p>"Less Than Significant"? Just look at the truck traffic trip frequency, Haul/Transport Truck Operations, per Chapter 3 - Project Description:</p> <table border="0"> <tr> <td style="padding-right: 20px;">1. engineered fill:</td> <td><u>50-100 round trips/day</u>. For the first five plus six years (eleven total), limited to the project site and to and from the Centennial site. Subsequently transported to "local markets", which would impact a much larger area of roads and their adjacent</td> </tr> </table>	1. engineered fill:	<u>50-100 round trips/day</u> . For the first five plus six years (eleven total), limited to the project site and to and from the Centennial site. Subsequently transported to "local markets", which would impact a much larger area of roads and their adjacent
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	<p><sup>1</sup> Question: How will 100 passing trucks/day with their diesel exhaust and dust from mining products affect Peaceful Valley's organic products and plant life? Will it affect their "organic" designation? Page 2 of 6</p>		





- residences/businesses/recreational or wildlife areas, extending far beyond the immediate area of the mine project.\*\*
- \*\*Has this extended area impact been addressed in the DEIR?**
- 2. gold concentrate: 1-5 trips/day, over the 80-year term of the use permit, 145-mile one-way trips to the Port of Oakland\*\*
  - 3. diesel fuel tankers: 1 every 2 weeks, to and from the project site, using Brunswick Road to SR 20/49, over the 80-year term of the use permit, through residential, business, natural environments and fire danger zones  
2 tankers/day in times of inevitable PSPS shut-offs for additional fuel demands of back-up generators
  - 4. cement trucks: 9 trucks/week, max. 2/day
  - 5. freight trucks: 3/week, max. 3/day, Brunswick Rd. to and proceeding along SR 20/49 over the 80-year term of the use permit
  - 6. explosives via semi-trucks: 1/week, max., min. 1 every 3 weeks (during initial underground construction, explosives may be transported to the site more frequently)  
These trips will be through rural—including fire danger zones—and heavily populated traffic areas over the 80-year term of the use permit.
  - 7. personal employee vehicles: 217 vehicle parking spaces are provided. Some of these trips would be local, but a minimum of 99 workers would be from outside the local area.\*\*
- Haul trucks, freight trucks, explosive trucks, and cement delivery trucks are anticipated to have a 60-mile one-way trip length (4.3-71)\*\*

So, somewhere between 370 and 785 truck trips per week, plus however many personal vehicles fill up to 217 parking spaces daily—should we multiply 217 times the number of shifts per day times seven days per week? Even using 2 shifts per day when there are certain jobs which have three shifts per day, that is  $217 \times 2 \times 7 = 3,038$  round trips of personal vehicles per week? That's hard to believe; I really hope my math is wrong on that!

These truck and personal vehicle trips not only contribute to **4.10 Noise and Vibration**, but also **4.3 Air Quality, Greenhouse Gas Emissions, and Energy**, **4.7 Hazards and Hazardous Materials**, **4.12 Transportation (Traffic)**, **4.13 Wildfire**, and overall quality of life.

In terms of wildfire danger—notwithstanding the potential for accidents involving explosives transport and diesel transport—the project would add a considerable number of trucks, other project vehicles, and employees' personal autos to the community. Despite the statement in 4.7-4 that this impact would be Less than Significant in the event of an emergency evacuation, this added number of vehicles would exacerbate any emergency evacuations in an area where there are limited evacuation routes. We had two such evacuation orders in this vicinity last year and I can tell you, having been part of those evacuations, that directing the hauling vehicles to "pull off the road to enable residents to evacuate" is not a solution. No doubt, in an active fire situation, those drivers are going to want to leave the vicinity, as will the workers at the mine who fill the 217 parking spaces on the project site.

Ind 622-6



Ind 622-7

As to 4.3 Air Quality, I will mostly defer to the comments made by Dr. Jeff Kane at the Public Hearing as he addressed the already "F-grade" quality of air in our county and spoke about the list of toxic airborne substances that will degrade that further (8.5 million tons known to be toxic over 80 years) saying "We can't take this!" He also pointed out that requisite mitigation measures are too numerous to enforce.

Ind 622-8

**Chapter 4.5 – Cultural and Tribal Cultural Resources** Page 4.5-28 ... *the project applicant possesses a private library of information that describes the underground mine workings of the Idaho-Maryland Mine in its entirety.*

4.5-1(a) *Following initial mine dewatering, and prior to commencement of underground mining, the project applicant shall share the historical documentation of the Idaho-Maryland Mine Company in their possession with the public through one of the following libraries: the California State Library, the California Geology and Mining Library, or the Searls Library. The library shall consist of the following information: nine descriptions follow of maps (388) and documents, photos and drawings dated from 1919 through 1956.*

I am just curious, if "A significant public and historic preservation benefit may be gained from sharing the library with the public," why wait until the mine is dewatered? Why not donate those significant documents now?

Ind 622-9

**4.9 Land Use and Population and Housing**

Page 4.9-26, *It is anticipated that approximately 99 workers (32 percent of workforce) would be recruited from outside the local area; these positions require extensive experience in underground mining which are less likely to be possessed by persons currently residing in the immediate local area.*

*The addition of 240 persons as a result of the proposed project would not impact the existing housing stock for Nevada County, given the existing vacancy rates.*

Despite tables showing vacant housing, it is well known that housing in our county is not easy to come by. My own personal experience and that of friends in the last few years illustrates how difficult it is to find quality affordable housing. With an anticipated minimum of 99\* workers recruited from outside the local area, that is a strain on our housing infrastructure, not a less-than-significant impact on people in this county already having trouble finding adequate housing.

\*Rise may say they anticipate hiring 68% of the workforce locally but can they be held to that number?

Ind 622-10

**Climate Change**

Did the DEIR consider the affects of climate change—change in weather patterns, temperature increases, extended drought, etc.—in its calculations and mitigations for each of the impact categories? If climate change effects are not addressed in the DEIR, then its conclusions cannot be relied on over the extensive timeline of this proposed project. The subject of climate change was discussed in detail in 4.3, but I did not see it specifically addressed in the project impacts and mitigations portions of the DEIR chapters.

As just one instance, the effects on changes to the water table caused by climate change and/or prolonged drought combined with the impacts of the mine project, how could that cumulatively affect health of the landscape and habitat above the dewatered mining areas over 80 years? Potential loss of trees? Tree loss due to drought and the pine bark beetle is already here. Potential increase in fuel for wildfires if landscape dries/dies out? This is just one element that could be impacted. Almost every other chapter in this DEIR could be impacted by climate change as it progresses.





Ind 622-11

**4.3 Air Quality, Greenhouse Gas Emissions, Energy**

The DEIR may detail the mitigations of numerous fuel saving measures or procedures that lessen pollutants, but that does not address the massive amounts of diesel fuel (and gasoline) that will be sourced and burned 24/7 over 80 years—just refer to the above-mentioned vehicle trip frequencies—nor the sum total of pollutants over the 80 years. No matter what mitigation techniques are in effect, the cumulative detrimental effects to air quality and the creation of greenhouse gas emissions in an era of climate catastrophe is not adequately addressed in this report. In this time when we need to address and reverse the danger to our planet, the microcosm that is this proposed project does just the opposite.

Because state regulations regarding air quality and greenhouse gas emissions may well become more stringent as the climate crisis evolves, will this proposed project be liable to follow new regulations as they arise or will it be required to follow only those in force at the time the permit is approved?

Ind 622-12

**4.3-7(b) Carbon Offsets – Construction Emissions.**

*Rise Grass Valley Inc. (Rise) shall retire carbon offsets in a quantity sufficient to offset the project's construction greenhouse gas (GHG) emissions*

What specific offsets are proposed? Instead of a financial transaction of retiring carbon offsets, can these be actual project site physical rectifications such as creating a clean renewable energy source like solar to meet the project's energy demand, or planting trees along the trucking route as well as replacing those trees lost as a result of the project, or requiring employees to carpool or bike to work with a majority of parking spaces allocated to electric vehicles rather than just a few spaces—something to benefit the community where the construction related emissions actually take place?

Ind 622-13

There are so many areas I have issues with and questions about. I have only addressed a portion in this letter. I do not see many positive effects that will result from this project going forward; overwhelmingly negative impacts to our environment and community.

Those copious impacts that the report declares will be mitigated, are dependent on massive amounts of regulations and oversight. Who will be watching to ensure all these regulations are followed and met? The Planning Department? Independent investigators? Regulatory representatives? Rise Gold itself? Who pays for that? As Jeff Kane said at the March meeting, the requisite mitigation measures are too numerous to enforce. Even a small number of these mitigations, if not followed, could be devastating to our county.

Thank you for your work on this. You have a tremendous job ahead of you.

Nicki Hansen-Dix  
115 Union Jack St, #38, Grass Valley, CA 95945  
530-320-9647

Note 1

As stated in an Atlantic article November 2019, Why Everything Is Getting Louder, By Bianca Bosker

Scientists have known for decades that noise—even at the seemingly innocuous volume of car traffic—is bad for us. "Calling noise a nuisance is like calling smog an inconvenience," former U.S. Surgeon General William Stewart said in 1978. In the years since, numerous studies have only

Page 5 of 6



underscored his assertion that noise "must be considered a hazard to the health of people everywhere." Say you're trying to fall asleep. You may think you've tuned out the grumble of trucks downshifting outside, but your body has not: Your adrenal glands are pumping stress hormones, your blood pressure and heart rate are rising, your digestion is slowing down. Your brain continues to process sounds while you snooze, and your blood pressure spikes in response to clatter as low as 33 decibels...

Experts say your body does not adapt to noise. Large-scale studies show that if the din keeps up—over days, months, years—noise exposure increases your risk of high blood pressure, coronary heart disease, and heart attacks, as well as strokes, diabetes, dementia, and depression. Children suffer not only physically—18 months after a new airport opened in Munich, the blood pressure and stress-hormone levels of neighboring children soared—but also behaviorally and cognitively. A landmark study published in 1975 found that the reading scores of sixth graders whose classroom faced a clattering subway track lagged nearly a year behind those of students in quieter classrooms—a difference that disappeared once soundproofing materials were installed.

Alex Brown's article on how noise pollution hurts wildlife for Pew Trusts, October 22, 2019 states, "Increasingly, research shows that human-caused noise can be harmful to many species."

The literature has shown that noise fundamentally changes behavior, distributions and reproductive success [for wildlife]," said Jesse Barber, who runs the Sensory Ecology Lab at Boise State University.

Several years ago, Boise State's Barber and a team of scientists installed 15 speakers in an Idaho woodland and played traffic noises to create a "phantom road" over half a mile of terrain. They found that 30% of songbirds moved elsewhere once the noise began, and many other species that remained struggled to gain weight.

[Human generated noise]...has been linked to decreases in species diversity, bird populations, and tree growth.



## INDIVIDUAL LETTER 622: NICKI HANSEN-DIX

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### Response to Comment Ind 622-1

Regarding quality of life concerns, please see Master Response 1 - Non-EIR/Administrative Issues.

The commenter states that the DEIR is missing elements of an impact such as proposed NID pipeline impact on property owners. However, the commenter provides no information as to which elements are missing from the DEIR. The impacts of the proposed NID pipeline are analyzed throughout the DEIR (see Chapters 3 and 4 of the DEIR).

The commenter states that noise impacts are “downplayed” in the DEIR, but provides no specific information as to why these impacts are downplayed. The commenter is referred to Chapter 4.10 of the DEIR. As stated on page 4.10-45 of the DEIR:

Based on the above [analysis], none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 is included out of an abundance of caution to ensure satisfaction with such standards and to reduce the potential for annoyance resulting from the proposed project to the maximum extent feasible. It is conservatively concluded that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and the project’s noise impacts could be **significant**.

Mitigation Measure 4.10-2 requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County’s third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Mitigation Measure 4.10-2 also requires quarterly noise monitoring by the County’s third-party noise consultant during the first five years of project operation, and once per year thereafter for the life of the project.

The commenter states that impacts that the DEIR determined to be less than significant are actually significant and provides light and glare as an example due to its location in a rural area and the 24/7 operations proposed by the project. As discussed on pages 4.1-23 through 4.1-29 of the DEIR, the proposed project would not create a new source of substantial light or glare which





would adversely affect day or nighttime views in the area. The determination of less than significant is based on substantial evidence provided in the form of a photometric plan for the Brunswick Industrial Site, inclusive of lighting types and projected lumen intensities across the site. As stated on page 4.1-24 of the DEIR, based on the photometric plan:

[...] the lighting intensities at the northern property line, near East Bennett Road, are at 0.0 foot-candles<sup>5</sup>, and thus, light spillover is not projected to occur off-site. The nearest proposed pole-mounted LED, which is International Dark Sky Association compliant, would be located approximately 100 feet from East Bennett Road. Thus, the existing sensitive receptor along New Brunswick Court would not be impacted by light spillover from the proposed on-site lighting. Similar conclusions can be made for the remainder of the property boundaries, based on the Photometric Plan; no light spillover is projected to occur at the property boundaries.

### **Response to Comment Ind 622-2**

Please see response to Nevada Irrigation District comments – Agency Letter 10 of the Final EIR.

Regarding quality of life, please see Master Response 1 - Non-EIR/Administrative Issues.

Drinking water supplied to Nevada Irrigation District (NID) customers continues to meet and exceed state and federal public health standards, based on testing results that serve as the basis for the District's Water Quality Report. See <https://www.nidwater.com/files/1e68c2c9b/NID+WQR+2021.pdf>

The Well Mitigation Plan has been modified to clarify the range of actions that would be taken if necessary for well mitigation outside of the E. Bennett Road area, if unanticipated well impacts occur. Connection to NID potable water would be one of many options available for well mitigation. Please see modified Well Mitigation Plan attached to the Final EIR as Appendix D. Any cost of well mitigation, including deepening of wells, would be the responsibility of the applicant.

### **Response to Comment Ind 622-3**

No mining would be done outside of the mineral rights boundary. Figure 4.8-13 shows sensitivity scenario 6 from the groundwater model, where planned mining is extended for an additional 40 years past the 25-year base-case. As discussed on pages 27 and 28 of Appendix K.3, the expansions in Scenario 6 would represent a major discovery of parallel veins, similar to those mined historically in the Brunswick Mine, within the known mineralized system. These expansions are modeled to depth below the Idaho and Brunswick Mines and below the “Mitchell Crosscut,” which extends past the main mine workings to the north on the 1,000-ft level. As can be seen in the figure the existing Brunswick mine workings were copied in order to generate the conceptual mine workings for the sensitivity scenario, which results in some mine workings outside of the mineral boundaries that would not occur in reality and therefore provides conservatism to the analysis of groundwater impacts. Nonetheless, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps A101, A201 and A202), and will also prohibit blasting closer than 500 feet below ground surface except for construction of the service shaft. Please see Appendix A to the Final EIR for the aforementioned maps.

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<sup>5</sup> One foot-candle is a unit of illumination equal to that given by a source of one candle at a distance of one foot.



#### **Response to Comment Ind 622-4**

The commenter states that noise and vibration from the project would affect people, animals and vegetation at the project sites and local and state roads and highways and these impacts are unmitigable. The commenter references “Note 1”, which is excerpted from several newspaper articles. Noise and vibration impact thresholds used in the impact analysis, in accordance with CEQA guidelines, is provided in Chapter 4.10 of the DEIR. Note that heavy trucks and lighter vehicles already exist on local roadways as a source of traffic noise, and the project would only add an incremental increase to existing noise levels. Wildlife disturbance is discussed on page 4.4-74 of the DEIR.

The commenter asks if diesel exhaust and dust will affect Peaceful Valley’s organic products for “organic” designation. Numerous trucks already travel on Whispering Pines Lane, and the project would add an incremental increase to existing traffic volumes. Please see Table 32 of Appendix O of the DEIR. Please also see Master Response 18 - Air Quality Thresholds.

#### **Response to Comment Ind 622-5**

Employee schedules are shown in Table 3-8 of the DEIR. Noise impacts from project traffic has been analyzed in the DEIR. Please see Chapter 4.10 and Appendix L of the DEIR. Specifically, please refer to Impact 4.10-2 of the DEIR, which evaluates traffic noise level increases attributable to all project traffic. The traffic noise analysis determined that the project’s incremental traffic would not exceed the applicable traffic noise increase thresholds along surrounding roadways.

However, the analysis determined that noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Therefore, the project could result in the generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, and a significant impact could occur. Mitigation Measure 4.10-2 would reduce the potential jake brake noise impact to a less than significant level.

#### **Response to Comment Ind 622-6**

Regarding quality of life, please see Master Response 1 - Non-EIR/Administrative Issues.

Please see Master Response 5 - Evacuation Zones.

Regarding truck and personal vehicle trip noise and emissions, these are evaluated Chapter 4.10 (see Impact 4.10-2) and Chapter 4.3 (see Impacts 4.3-1 and 4.3-2), respectively.

#### **Response to Comment Ind 622-7**

Please see Master Response 18 - Air Quality Thresholds.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. The County has adequate staff and expertise for enforcing permit conditions, and routinely enforces similar conditions and mitigation measures on other projects in the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

#### **Response to Comment Ind 622-8**

The mitigation measures of the DEIR are designed to mitigate impacts from the proposed project. The proposed project has not been approved or implemented at this time; thus, the mitigation is not yet required and the County has no present legal authority to request the referenced private documents.



### **Response to Comment Ind 622-9**

As discussed on page 4.9-25 of the DEIR, Nevada County has 53,745 total housing units with a 22.5 percent vacancy rate (12,098 vacant housing units). The unincorporated area of Nevada County has a total of 32,182 housing units with 4,645 vacant housing units (14.4 percent vacancy rate). Therefore, it is reasonably anticipated that the addition of 312 persons to the County as a result of increased employment generated by the proposed project could be accommodated by existing housing stock in Nevada County.

The County cannot enforce local hiring. However, as stated on page 4.9-26 of the DEIR, substantial economic incentives exist to maximize employee recruitment from the local Nevada County area.

### **Response to Comment Ind 622-10**

Please see Master Response 16 - Drought and Climate Change.

### **Response to Comment Ind 622-11**

The air emissions and greenhouse gas emissions for project activities and cumulative impacts have been analyzed for the project. Please see Chapter 4.3 of the DEIR.

The project would be subject and required to comply with any new state regulations regarding air quality and greenhouse gas emissions imposed throughout the life of the project that are applicable to vehicle standards or other operational aspects to which those standards apply.

### **Response to Comment Ind 622-12**

The commenter suggests that onsite improvements or local tree-planting be used to offset the Greenhouse Gas emissions of the project. However, climate change is a global impact, so purchase of carbon credits from off-site sources would have the same global mitigation impact as compared to onsite or local mitigation. The commenter's suggested mitigation would not avoid or lessen a significant project impact, so it is not required to be implemented under CEQA.

As discussed on page 4.12-82 of the DEIR, because the Proposed project is anticipated to employ approximately 312 direct employees during full operations, pursuant to Section L-II 4.1.9 of the Nevada County LUDC, the Project Applicant would be required to submit a detailed analysis of transportation alternatives, documenting feasible measures for reducing auto dependence. Although the overall project site is not currently served by transit and the Nevada County Transit Services Division does not have plans to bring service to the project area, the nearest bus route to either the Brunswick Industrial Site or Centennial Industrial Site is Route #3, which operates between the Tinloy Street/Bank Street Transit Center and the Nevada County Airport and passes directly by the Centennial Industrial Site. The proposed project would incorporate an area for bicycle racks at the Brunswick Industrial Site, which would provide a minimum of 11 racks (44 bicycle spaces). Pursuant to Nevada County LUDC, additional potential transportation reduction alternatives for the proposed project were identified in the Traffic Impact Analysis prepared for the proposed project, based on the Transportation Demand Management strategies included in the Vehicle Miles Traveled Implementation report prepared by Fehr & Peers for the NCTC.

### **Response to Comment Ind 622-13**

Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. The County has adequate staff and expertise for enforcing permit conditions, and



routinely enforces similar conditions and mitigation measures on other projects in the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.



Individual Letter 623

**IDAHO-MARYLAND MINE PROJECT  
DRAFT EIR COMMENT FORM**

To document the author of comments received, please provide the following information. Thank you.

Name: Nicki Hansen-Dix

Address: 115 Union Jack St #38 GV 95945

Organization (if applicable): \_\_\_\_\_

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

**Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 95959-8617  
Idaho.MMEIR@co.nevada.ca.us**



Ind 623-1

There are so many "Impacts" with No mitigation specifics identified but still state the impact listed as Significant (S) as being reduced to Less than Significant (LS) post mitigation.

i.e., mitigation measure says must provide plan, proposed plan, proposed tests, shall submit, plan will be required, etc.

There is no way to verify in this DEIR that S will go to LS post mitigation based on no mitigation methods currently submitted.

All Impacts that rely on future plans should not be termed LS without a mitigation described.





## **INDIVIDUAL LETTER 623: NICKI HANSEN-DIX**

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### **Response to Comment Ind 623-1**

The comment expresses a general opinion that the DEIR contains potentially significant impacts that are mitigated to less-than-significant levels without providing mitigation measures to reduce the severity of such impacts; however, the commenter does not provide specific examples that would allow for a detailed response.

The DEIR includes mitigation measures to reduce potentially significant impacts to the extent feasible, with most mitigation measures reducing identified potential impacts to less-than-significant levels. Where the mitigation measures set forth therein do not reduce identified impacts to a less-than-significant level, the DEIR discloses that such impacts would remain significant and unavoidable.

In instances where mitigation measures require future preparation of plans to prevent potential impacts, such measures include specific standards with which the future plans must comply. For example, Mitigation Measure 4.6-3(a) requires that the Project Applicant have a final geotechnical engineering report prepared by a State-registered civil engineer that shall be incorporated into the project improvement plan submittals. Mitigation Measure 4.6-3(a) further requires that the recommendations from the final geotechnical engineering report be incorporated into the project improvement plans. Finally, the mitigation additionally requires that grading plan review and construction monitoring shall occur in accordance with the recommendations from the Geotechnical Engineering Reports (Geotechnical Engineering Report, Idaho-Maryland Mine Project – Brunswick Industrial Site. November 18, 2019; and Geotechnical Engineering Report, Idaho-Maryland Mine Project – Centennial Industrial Site. December 20, 2019). Through compliance with the above, potential impacts related to unstable geological units or soil would be reduced to less than significant.



Fwd: mine

**Individual Letter 624**

about:blank?compose

Dist 5

**RECEIVED**

MAR 14 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Nevada County Board of Supervisors  
950 Maidu Ave., Suite 200  
Nevada City, CA 95959

March 9th, 2022

Dear Supervisor Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

**Ind 624-1**

I see no benefit coming to the County from the opening of the Idaho-Maryland Mine by Rise Gold.

**Ind 624-2**

From the DEIR I see that water availability for the mine project is based on past years, not on current extreme drought years. Rise Gold has grossly underestimated the impact water use and water removal will have on the water table and adjacent homes, while offering a paltry mitigation time period within the 80 years of their lease. The noise and vibration from trucks and blasting, and diesel and heavy metal mine dust pollution are all dangerous to our health and businesses. Dumping massive amounts of water into Wolf Creek will stir up past mining toxins in the stream channel and destroy habitat. We already live in a cancer hot spot. We have already experienced the toxic effect of the past mining era. New safety technologies can not mitigate all this. And why does anyone trust Ben Mossman of Rise Gold? His Banks Island Gold, polluted tribal waters, went bankrupt and left a mess for Canadians to clean up. He and others involved have 18 pollution charges that are going to trial in April.

**Ind 624-3**

My business is located in the town of Grass Valley. I already am negatively impacted from the noise, vibration and bad air along the 49/South Empire corridors. I DO NOT WANT an industrial gold mine at my front door and I don't know a single person, no matter their political persuasion, who thinks this mine is a good idea. For God's sake please find another source of tax dollars that will actually benefit the community instead of polluting our County and making us sick.

Thank you for your dedication to Nevada County,

Nina Allen Cunningham  
11566 Valencia Rd.  
Nevada City, CA 95959  
530-478-1248

*ninaallenc@sbcglobal.net*



## **INDIVIDUAL LETTER 624: NINA CUNNINGHAM**

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### **Response to Comment Ind 624-1**

Please see Master Responses 13 through 16 regarding the commenter's water and drought concerns.

### **Response to Comment Ind 624-2**

The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds.

Regarding general noise concerns, please see Chapter 4.10, Noise and Vibration.

The commenter also appears to raise legacy contaminant concerns from past mining. Please refer to Response to Comment Grp 25-30.

Please also see Master Response 3 – Operator Responsibility.

### **Response to Comment Ind 624-3**

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project. Please see Master Responses 1 and 2.



**Individual Letter 625**

Fwd: mine

about:blank?compose

Nevada County Board of Supervisors  
950 Maidu Ave., Suite 200  
Nevada City, CA 95959

Dist 5

March 9th, 2022

Dear Supervisor Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

**Ind 625-1**

I see no benefit coming to the County from the opening of the Idaho-Maryland Mine by Rise Gold.

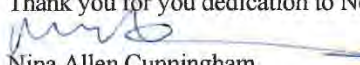
**Ind 625-2**

From the DEIR I see that water availability for the mine project is based on past years, not on current extreme drought years. Rise Gold has grossly underestimated the impact water use and water removal will have on the water table and adjacent homes, while offering a paltry mitigation time period within the 80 years of their lease. The noise and vibration from trucks and blasting, and diesel and heavy metal mine dust pollution are all dangerous to our health and businesses. Dumping massive amounts of water into Wolf Creek will stir up past mining toxins in the stream channel and destroy habitat. We already live in a cancer hot spot. We have already experienced the toxic effect of the past mining era. New safety technologies can not mitigate all this. And why does anyone trust Ben Mossman of Rise Gold? His Banks Island Gold, polluted tribal waters, went bankrupt and left a mess for Canadians to clean up. He and others involved have 18 pollution charges that are going to trail in April.

**Ind 625-3**

My business is located in the town of Grass Valley. I already am negatively impacted from the noise, vibration and bad air along the 49/South Empire corridors. I DO NOT WANT an industrial gold mine at my front door and I don't know a single person, no matter their political persuasion, who thinks this mine is a good idea. For God's sake please find another source of tax dollars that will actually benefit the community instead of polluting our County and making us sick.

Thank you for your dedication to Nevada County,

  
Nina Allen Cunningham  
11566 Valencia Rd.  
Nevada City, CA 95959  
530-478-1248

[ninaallenc@sbcglobal.net](mailto:ninaallenc@sbcglobal.net)



## **INDIVIDUAL LETTER 625: NINA CUNNINGHAM**

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### **Response to Comment Ind 625-1**

Please see Response to Comment Ind 624-1.

### **Response to Comment Ind 625-2**

Please see Response to Comment Ind 624-2.

### **Response to Comment Ind 625-3**

Please see Response to Comment Ind 624-3.





**Individual Letter 626**  
about:blank?compose

(no subject)

Nevada County Planning Commission  
950 Maidu Ave., Suite 170  
Nevada City, CA 95959

March 9th, 2022

To The Planning Commission:

**Ind 626-1**

I see no benefit coming to the County from the opening of the Idaho-Maryland Mine by Rise Gold.


**Ind 626-2**

From the DEIR I see that water availability for the mine project is based on past years, not on current extreme drought years. Rise Gold has grossly underestimated the impact water use and water removal will have on the water table and adjacent homes, while offering a paltry mitigation time period within the 80 years of their lease. The noise and vibration from trucks and blasting will disturb my patient. The diesel fumes and heavy metal mine dust pollution are all dangerous to our health and businesses. Dumping massive amounts of water into Wolf Creek will stir up past mining toxins in the stream channel and destroy habitat. We already live in a cancer hot spot. We have already experienced the toxic effect of the past mining era. New safety technologies can not mitigate all this. And why does anyone trust Ben Mossman of Rise Gold? His Banks Island Gold, polluted tribal waters, went bankrupt and left a mess for Canadians to clean up. He and others involved have 18 pollution charges that are going to trail in April.

**Ind 626-3**

My business is located at 518 South Auburn St., Grass Valley. I already am negatively impacted from the noise, vibration and bad air along the 49/South Empire corridors. I DO NOT WANT an industrial gold mine at my front door and I don't know a single person, no matter their political persuasion, who thinks this mine is a good idea. For God's sake please find another source of tax dollars that will actually benefit the community instead of polluting our County and making us sick.

Thank you for your dedication to Nevada County,

  
Nina A Cunningham  
11566 Valencia Rd  
Nevada City, CA 95959  
530-478-1248  
ninaallenc@sbcglobal.net



## **INDIVIDUAL LETTER 626: NINA CUNNINGHAM**

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### **Response to Comment Ind 626-1**

Please see Response to Comment Ind 624-1.

### **Response to Comment Ind 626-2**

Please see Response to Comment Ind 624-2.

### **Response to Comment Ind 626-3**

Please see Response to Comment Ind 624-3.



**Individual Letter 627**

**From:** Nora Nausbaum <noraroberta@gmail.com>  
**Sent:** Saturday, April 2, 2022 10:29 AM  
**To:** Idaho MMEIR  
**Subject:** NO Mine

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

**Do not click links or open attachments unless** you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

No Mine -- Increased fire danger due to large trucks on the road, increased mine water needs. Probable increased air, water, soil pollution. Guarantees from Rise Gold are not trustworthy since their track record is very poor.

**Ind 627-1**

Nora Nausbaum  
Bill Douglass  
15631 Lower Colfax Road  
Grass Valley, CA  
(530) 273-5489 h  
(530) 798-9585 c



## **INDIVIDUAL LETTER 627: NORA NAUSBAUM**

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### **Response to Comment Ind 627-1**

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Regarding fire concerns, please see Master Responses 5 and 6. Regarding water concerns, please see Master Responses 14 and 15. Regarding general air, water, and soil pollution concerns, please see Chapters 4.3, 4.8, and 4.7, respectively.



**Individual Letter 628**

**From:** [Nora Risen](#)  
**To:** [RCS Public Comment](#)  
**Subject:** NO GOLDMINE MINE...PLEASE READ!  
**Date:** Thursday, February 3, 2022 7:49:06 PM

Cannot confirm residency

**CAUTION:** This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear BOS,

**Ind 628-1**

I am against the reopening of the old Idaho Maryland Mine site reopening by Rise Gold. They purchased the property with its current zoning which prohibits a gold mine operation. Please do not approve a conditional use permit for Rise Gold and change zoning. Residents purchased properties around the site with the assurance that a heavy industrial operation would not be allowed. Many residents like me looked at the Nevada County General plan before we purchased in this county. You can't just rip it up, change it and make it up as you go!

**Ind 628-2**

If you allow the goldmine and your best efforts to mitigate fail, we have so much to loose:

**Ind 628-3**

**Ind 628-4**

**Ind 628-5**

**Ind 628-6**

**Ind 628-7**

**Ind 628-8**

**Ind 628-9**

**Ind 628-10**

**Ind 628-11**

**Ind 628-12**

**Ind 628-13**

- Unacceptable noise levels and destruction of quiet enjoyment of surrounding taxpayer properties
- Trucking of toxic waste causing pollution, traffic and destruction to our residential roadways
- Huge Increase in energy consumption, pollution and noise due to the massive diesel generators and additional electrical needed
- Drinking water/well water integrity and possibility of dry wells to neighboring community (Look at our history please. Look at San Juan Ridge and Lost Lake where a US Federal Superfund to clean up is STILL in place DECADES LATER!)
- Unacceptable water toxin levels dumped into the Wolf Creek. There are sensitive wetland area in certain areas where you have already allowed at least one large scale commercial cannabis grow on an active wetland with nesting and breeding species. Unbelievable!
- Uncertain underground tunnel integrity leading to a whole new slew of ground issues
- 80 years, 24/7 operation
- Loss of property values
- Rise Gold history of litigation of toxic dumping in their homeland of Canada and history of insolvency / bankruptcy
- 70 or so underground mining jobs created for all of our sacrifice? High level jobs have been spoken for according to Rise Gold.
- Is Nevada County receiving anything of monetary value for approving the goldmine? As constituents, we must be made aware of all promised to you or the county.

Please ask yourselves in honesty, does Nevada County really have the people power to oversee this HUGE Goldmine operation which YOU WILL BE RESPONSIBLE FOR, with all the commercial cannabis already approved among other day to day operations? Already we are seeing violations of cannabis operations you have made agreements with and they have failed to comply. I have written to you about these,

NO MINE! It would be a catastrophe of epic proportions in so many ways. Please do your part





and vote NO on the mine.

Our HEALTH before their WEALTH.  
WE ARE MORE VALUABLE THAN GOLD!

Nora Risen



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## **INDIVIDUAL LETTER 628: NORA RISEN**

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### **Response to Comment Ind 628-1**

The commenter opposes the project and urges the County not to approve a Conditional Use Permit. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 628-2**

The commenter states that the project will result in unacceptable noise levels but provides no additional information and does not state how the DEIR is inadequate. The commenter is referred to Chapter 4.10 (Noise and Vibration). The only unacceptable noise levels would occur during the temporary construction of the potable water pipeline along East Bennett Road. "Unacceptable" in this context is defined as exceeding the applicable County noise thresholds after implementation of feasible mitigation.

### **Response to Comment Ind 628-3**

The commenter is concerned about the transport of engineered fill, traffic impacts, and damage to local roadways. The commenter does not provide any additional information and does not state how the DEIR is inadequate. Air emissions from trucks are analyzed in Chapter 4.3 of the DEIR, traffic and roadway impacts are analyzed in Chapter 4.12 of the DEIR.

### **Response to Comment Ind 628-4**

The commenter states that the project's use of diesel generators will have negative impacts to noise, air quality, and energy consumption but does not state how the DEIR is inadequate in analyzing and mitigating these impacts. Noise impacts from backup diesel generators is less than significant after mitigation. (DEIR p. 4.10-43.) Air emissions from the use of backup diesel generators are provided on page 4.3-104 of the DEIR. As noted in the DEIR, because the use of emergency generators is speculative and beyond the reasonable control of the Project Applicant, the emissions presented in Table 4.3-25 are for informational purposes only. Finally, it is important to note that while the use of emergency generators during power-outages such as PSPSs is outside of the scope of CEQA, the regular use of generators for routine maintenance and testing has been considered throughout the entirety of the analysis of the chapter, as such use is not speculative.

### **Response to Comment Ind 628-5**

The commenter is concerned about the water quality and water quantity impacts to groundwater wells but does not state how the DEIR is inadequate. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 8 - Mine Waste Characterization, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 628-6**

The commenter states that the treated water being discharged to South Fork Wolf Creek contains unacceptable toxin levels. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 628-7**

The commenter is concerned about the integrity of the underground mine workings. The commenter is referred to Chapter 4.6 (Geology, Soils, and Mineral Resources) of the DEIR and Master Response 29 - Near Surface Workings.



**Response to Comment Ind 628-8**

The commenter states “80 years, 24/7 operation.” There is not enough information to formulate a specific response. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

**Response to Comment Ind 628-9**

The commenter states the project will result in the loss of property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

**Response to Comment Ind 628-10**

The commenter references the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

**Response to Comment Ind 628-11**

The commenter states that the high paying jobs from the generated from the project should come from other industries. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

**Response to Comment Ind 628-12**

The commenter asks what economic benefits the project is bringing to the County. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

**Response to Comment Ind 628-13**

The commenter urges the County not to approve the project. The commenter’s opposition to the project is noted for decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.



Individual Letter 629

**Norema Strongin**  
12567 Echo Dr. Nevada City CA 95959  
530-272-2049

Matt Kelley  
Nevada County Planning Dept.  
950 Maidu Ave, Ste 170  
Nevada City, CA 95959-7902  
February 23, 2022



Re: Comments on EIR for Rise Gold Mining Project

Dear Mr. Kelley,

I am a retired attorney who has lived in Nevada City for 14 years. I have reviewed the Draft EIR and have the following comments.

Ind 629-1

1. As noted in the EIR, "The much larger mineral rights boundary encompasses approximately 2,585 acres" this land is under our little mountain community, where we live, work and recreate. The vast size of the proposed project will inevitably have many negative effects on the daily lives of the people that live here. This fact places on you the obligation to make a thorough, independent review of everything presented by Rise Gold.

Ind 629-2

2. First, as to the Centennial Cleanup Project—there are many representations made in this section. However, the underlying issue is: what will our local and county government do if Rise Gold is unable or unwilling to fulfill these promises? What will be the cost to clean up the current hazardous conditions and any future hazardous conditions caused by the proposed mining operation. We know all too well what the consequences are when mines close and the hazardous waste is left for the local government to deal with! Only a multi-million-dollar bond could provide the funds necessary for the County to clean up after this disaster this would cause.

Ind 629-3

3. An essential issue that isn't addressed in the EIR is: what have the consequences been with respect to Rise Gold's projects in other areas? Did they meet all of their obligations? This is a critical question which requires an independent investigation.

Ind 629-4

4. Next, regarding the mining operation there is no doubt based on information in the EIR that this will be a noisy, dirty, industrial operation. Not only will they be mining underground which involves drilling and blasting, but they will be crushing and processing the ore. This proposal presents plans for the construction of "a commercially viable, financeable, major underground gold mine operation that will produce 1,000 tons per day (365,000 tons per year) of gold mineralization." Careful reading of the EIR reveals the many major destructive consequences this mine will have on native flora and fauna, and more! The weak suggestions regarding possible mitigation are not enough to protect this community. This project will have a more profound affect on our community than any project proposed during my many years as a resident.

Ind 629-5

5. I have read Rise Gold's self-serving promises regarding mitigation of these environmental effects and it is obvious that Rise Gold has no clear plan that could possibly protect the local area from damage. Rise Gold will "monitor" all of these destructive conditions and make "feasible" changes. Even then, their suggested mitigation efforts are insufficient to actually protect the community from the many negative effects of this project. Rise Gold promises to mitigate, when possible, but the truth is, most of the negative effects on our way of life will be impossible to mitigate. For example, they promise to cover their trucks. But that will not stop the negative affects of the noise, traffic, and excessive road wear caused by those trucks! Also, if you want to





Ind 629-6

see how unsuccessful we have been with covering loads to reduce pollution—just look at the road leading to the Transfer station—all of those loads are required to be covered, but the littering never stops.

6. Likewise, Rise Gold represents that it will monitor the ground water in the area, but that doesn't overcome the problem of the extensive water use proposed when we are in a continuing drought with no end in sight! They say that Rise Gold will take measures to provide another source of water for those with wells affected by the project. Exactly what will that consist of? Is that really feasible? What about the local residents that rely on well water for all of their household needs? What will the Board of Supervisors do if Rise Gold finds it impossible to actually supply an alternative water source when their wells dry up? Rise Gold suggests the alternative of giving residents who need water some monetary compensation. How will money help them if there isn't any alternative way for them to replace the water. Furthermore, this will not only affect wells. Our reservoirs have not been sufficiently supplied by snowpack for many years. Our residents need our precious water resources!

Ind 629-7

7. With respect to the "Generation of a substantial temporary increase in ambient noise levels in the vicinity of the project" the EIR doesn't deny that there will be a lot of noise and underground vibration in all areas where the mining and processing will occur. Also, there will be a continuing stream of very heavy, noisy trucks on our roads for years to come. Over and over in the "mitigation" suggestions, Rise Gold promises to monitor these problems and implement unspecified "engineering controls" to correct them. What if it is impossible to mitigate these problems? Has Rise Gold submitted any evidence that these conditions have been successfully removed has been in similar mining operations in other jurisdictions? If it can't be mitigated, Rise Gold promises to cease operations. Then what will the Board do? Will it make exceptions so the mine can continue to operate, or will they insist on fulfillment of these promises, causing Rise Gold to go out of business and leave the local government entities to deal with this defunct project and all of its unmitigated environmental destruction?

Ind 629-8

8. The EIR is full of promises, what if these promises are not kept? What will be the true cost of this project to the people of Nevada County then? I can tell you what will happen if Rise Gold contends that it has sufficiently mitigated the problems because further efforts are not economically feasible. There will be multiple law suits. How much will that cost the County? If we lose these cases—which as a retired lawyer I assure you is always a possibility—what will be the affect on our little town then? If mitigation is either impossible or economically unfeasible how will the Board of Supervisors clean up the remaining mess?

Ind 629-9

9. As you are aware, **As provided in the CEQA Guidelines Section 15021, public agencies are charged with the duty to avoid or minimize environmental damage where feasible. The public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social issues.** In view of the many issues I have raised in this short summary and the numerous other environmental, economic and social issues surrounding this project, there is only one feasible way to prevent this environmental damage and only one responsible conclusion available to the Planning Department. **Reject this project!**

Thank you for your consideration.

Sincerely,

*Noremark Strongin*





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## **INDIVIDUAL LETTER 629: NOREMA STRONGIN**

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### **Response to Comment Ind 629-1**

The commenter references the extent of the mineral rights boundary and states that the project will have many negative impacts but does not identify which impacts and does not state how the DEIR is inadequate. The commenter is referred to Master Response 7 - Location of Future Mining Areas.

### **Response to Comment Ind 629-2**

The commenter references the Centennial Industrial Site cleanup. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

### **Response to Comment Ind 629-3**

The commenter references the Project Applicant's prior mining projects. The commenter is referred to Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 629-4**

The commenter references the project's noise-related impacts and impacts to biological resources but provides no additional information needed to formulate a specific response. Noise impacts from the project are analyzed in Chapter 4.10 of the DEIR. Impacts to flora and fauna are analyzed in Chapter 4.4 of the DEIR. The commenter also states that the mitigation measures in the DEIR are not enough to protect the community but provides no specifics or evidence. The commenter is referred to Chapter 4 of the DEIR.

### **Response to Comment Ind 629-5**

The commenter states that the Project Applicant will fail to implement the mitigation measures described in the DEIR but offers no additional information. A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 - Operator Responsibility. In addition, the Project Applicant would be required to enter into agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road. (DEIR, Mitigation Measure 4.12-6(c).)

### **Response to Comment Ind 629-6**

The commenter is concerned about the project's impacts to groundwater wells, especially in light of the current drought. Chapter 4.8 analyzed impacts to groundwater supplies and the impacts were found to be less than significant after mitigation. The commenter is also referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

### **Response to Comment Ind 629-7**

The commenter is concerned about noise produced from operations at the Brunswick site and from project-related trucks. Chapter 4.10 (Transportation) analyzed noise-related impacts and found the impacts associated with the Idaho-Maryland Mine operations and trucking to be less than significant after mitigation. The commenter references the "engineering controls" in Mitigation



Measure 4.10-3 and asks what will happen if the project is not able to mitigate a particular impact. As stated in CEQA Guidelines Section 15384, “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.” As this comment amounts to speculation, no further response is necessary.

Regarding the commenter’s concerns that the Project Applicant will not mitigate significant impacts consistent with the DEIR, a mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is referred to Master Response 3 - Operator Responsibility.

**Response to Comment Ind 629-8**

The commenter is concerned that the Project Applicant will not implement the DEIR’s mitigation measures. A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.

**Response to Comment Ind 629-9**

The commenter urges the County not to approve the project. The commenter’s opposition to the project is noted for decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.



**Individual Letter 630**

Dist 1

**Norema and Edward Strongin**  
**12567 Echo Dr. Nevada City CA 95959**  
**530-272-2049**

RECEIVED

MAR 01 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Nevada County Board of Supervisors  
950 Maidu Ave,  
Nevada City, CA 95959-7902  
February 23, 2022

Re: Comments regarding Rise Gold Mining Project

Dear Supervisors

**Ind 630-1**

This is the first time we have ever written to any Supervisor, but we think the proposed Rise Gold Mining Project is of such critical importance to the people of Nevada County, especially those in Grass Valley, Nevada City, and the surrounding area, that we must let our voices be heard. We cannot remain members of the "silent majority" any longer.

**Ind 630-2**

Please make a careful, independent study of the track record of Rise Gold in other mining operations and the effect this mine would have on the quality of life in this area. Don't be fooled by Rise Gold ridiculous claim that it will employ the local people. There are no unemployed miners, mine managers, ore processors etc. in our local area. All but a small handful of these jobs will go to outsiders who will further strain our already stressed residential resale and rental markets. Local people could find themselves priced out of the local market for residential properties for sale or lease.

**Ind 630-3**

Please do an independent investigation of the actual environmental impact of this project on the local community: road congestion; wear and tear on our roadways, air pollution, use of precious water resources in this time of continuing drought, water pollution, toxic waste from the mine etc. etc. etc. We have personally spoken to about 50 people in our neighborhood and not one of them favors this mine!

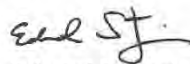
**Ind 630-4**

**BEWARE, THE BOARD OF SUPERVISORS IS BEING GIVEN MISLEADING INFORMATION FROM RISE GOLD! Make an independent investigation of all of their representations and we think you will see for yourselves the terrible consequences this project would have on our lovely mountain community. PLEASE DENY THIS APPLICATION!!**

Thank you for your consideration.

Sincerely,

  
Norema Strongin

  
Edward Strongin



## **INDIVIDUAL LETTER 630: NOREMA STRONGIN**

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### **Response to Comment Ind 630-1**

This comment is introductory in nature. The comment is noted.

### **Response to Comment Ind 630-2**

The commenter references the reputation of the Project Applicant and claims that the project will not employ local people, but will bring employees from outside the region and increase competition for housing. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 – Operator Responsibility.

### **Response to Comment Ind 630-3**

The commenter urges that an independent investigation be done for the project's various impacts. The DEIR is an independent investigation of the project impact's and was prepared by Raney Planning & Management under direct contract with the County of Nevada. In addition, Raney hired a team of technical experts to peer review the technical studies prepared by the Applicant's team of experts, and the technical studies were revised, as needed, in response to those comments. The commenter references a number of project impacts but does not provide any additional information. Traffic is analyzed in Chapter 4.12 (Transportation) of the DEIR, air quality is analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR, and water quality is analyzed in Chapter 4.8 (Hydrology and Water Quality) of the DEIR.

### **Response to Comment Ind 630-4**

The commenter urges the County to not approve the project. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.





Individual Letter 631

Nevada County Planning Commission  
950 Maidu Avenue, Suite 170  
Nevada City, CA, 95959

January 17, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

My name is Norma Solarz, I live in Grass Valley. I'm writing to state that I am OPPOSED to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation.

Ind 631-1

I understand that the Nevada County Planning Commission will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on approving or denying Rise Corporation. I am familiar with the the reasons given to allow the project or to deny it. I have come to the conclusion that the Rise Gold Mine information, and putative "survey," is intentionally misleading.

Ind 631-2

There is insufficient assurance that the significant negative impacts from re-opening the mine can be adequately mitigated now or in the future. There *will* be unmitigated significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

Ind 631-3

There are many reasons this mine should NOT be reopened. Despite the "assurances" given by Rise Corporation there *will* be permanent problems from de-watering the mine, excessive noise from trucks moving debris 24 hours a day will impact the quality of our lives, there will be damage to public infrastructure due to increased traffic on roads. In the end I do not believe that a "modern" mining operation will provide many jobs for local citizens. I believe the wealth will be taken from the land and our local community will be left again with little if any gain.

Ind 631-4

I am a Nevada County resident and see that the biased "survey" that Rise Gold Corporation touted demonstrates a lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from other Nevada County residents. Please be counted among the people who will stand against the well-funded project and misinformation scheme Rise Gold Mine is putting forth as good faith research. VOTE NO!

Sincerely,



800 Freeman Lane #209  
Grass Valley CA 95949  
510-326-8637  
[nsolarz@gmail.com](mailto:nsolarz@gmail.com)



Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington





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## **INDIVIDUAL LETTER 631: NORMA SOLARZ**

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### **Response to Comment Ind 631-1**

The comment expresses a general opinion that the information pertaining to the proposed project, but does not provide specific examples that would allow for a detailed response or specifically address the adequacy of the DEIR. Please see Master Response 1.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 631-2**

The comment expresses a general opinion that there is “insufficient assurance that the significant negative impacts...can be adequately mitigation now or in the future” and that there “will be unmitigated significant negative impacts” associated with the project, but does not provide specific examples that would allow for a detailed response or specifically address the adequacy of the DEIR. As noted in Chapter 5 of the DEIR, the proposed project would result in significant and unavoidable impacts related to aesthetics (substantial degradation of the existing visual character or quality of the site and its surroundings), and transportation (intersections of SR 174/Brunswick Road and Brunswick Road/Sutton Way). The DEIR provides substantial evidence that all other impacts would either be less than significant or less than significant with implementation of the mitigation measures incorporated into the DEIR. These mitigation measures will be made enforceable by state law through adoption of the mitigation monitoring and reporting program, included as Chapter 4 of this Final EIR.

### **Response to Comment Ind 631-3**

For concerns regarding dewatering of the mine, please see Master Responses 14 and 15. For the general noise concerns, please see Chapter 4.10, Noise and Vibration. Haul truck noise is addressed in Impact 4.10-2 of the DEIR. Regarding damage to roads, Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road.

For the commenter's opposition to the proposed project, please see Master Response 1.

### **Response to Comment Ind 631-4**

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 632**

Dist 3

RECEIVED

Nevada County Board of Supervisors  
950 Maidu Avenue, Suite 200  
Nevada City, CA, 95959

FEB 01 2022

January 17, 2021

NEVADA COUNTY  
BOARD OF SUPERVISORS

Ind 632-1

My name is Norma Solarz, I live in Grass Valley. I'm writing to state that I am OPPOSED to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation.

I understand that the Nevada County Planning Commission will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on approving or denying Rise Corporation. I am familiar with the the reasons given to allow the project or to deny it. I have come to the conclusion that the Rise Gold Mine information, and putative "survey," is intentionally misleading.

Ind 632-2

There is insufficient assurance that the significant negative impacts from re-opening the mine can be adequately mitigated now or in the future. There *will* be unmitigated significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

Ind 632-3

There are many reasons this mine should NOT be reopened. Despite the "assurances" given by Rise Corporation there will be permanent problems from de-watering the mine, excessive noise from trucks moving debris 24 hours a day will impact the quality of our lives, there will be damage to public infrastructure due to increased traffic on roads. In the end I do not believe that a "modern" mining operation will provide many jobs for local citizens. I believe the wealth will be taken from the land and our local community will be left again with little if any gain.

Ind 632-4

I am a Nevada County resident and see that the biased "survey" that Rise Gold Corporation touted demonstrates a lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from other Nevada County residents. Please be counted among the people who will stand against the well-funded project and misinformation scheme Rise Gold Mine is putting forth as good faith research. VOTE NO!

Sincerely,



800 Freeman Lane #209  
Grass Valley CA 95949  
510-326-8637  
nsolarz@gmail.com



## **INDIVIDUAL LETTER 632: NORMA SOLARZ**

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### **Response to Comment Ind 632-1**

Please see Response to Comment Ind 631-1.

### **Response to Comment Ind 632-2**

Please see Response to Comment Ind 631-2.

### **Response to Comment Ind 632-3**

Please see Response to Comment Ind 631-3.

### **Response to Comment Ind 632-4**

Please see Response to Comment Ind 631-4.



**Individual Letter 633**

**From:** Osher Levi <osherlevi12@gmail.com>  
**Sent:** Sunday, April 3, 2022 7:52 PM  
**To:** Idaho MMEIR  
**Subject:** I vote no for opening the mine

**CAUTION:** This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

**Do not click links or open attachments** unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

**Ind 633-1**

Instead of digging and disturbing our land, raping it, let's find more sustainable and supportive ways that show respect to the mother, Mother Earth, treat her with kindness and care.

We are invited to ask ourselfsthe question:  
How can we be better stewards of this planet?  
Let's ponder on that one.

Peace 🍷

--  
Sent from Gmail Mobile



## **INDIVIDUAL LETTER 633: OSHER LEVI**

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### **Response to Comment Ind 633-1**

The comment does not address the adequacy of the DEIR, but expresses general concern regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 634**

Mar 25, 2022

To: Matt Kelley, Senior Planner

Nevada County Planning Department  
950 Maidu Ave, Suite 170  
Nevada City, CA  
530-265-1423  
Matt.Kelley@co.nevada.ca.us  
Idaho.MMEIR@co.nevada.ca.us

Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR.

**ASUR PLAN ANALYSIS**

**PREPARATION OF ASUR PLAN**

**Ind 634-1**

This plan has been developed by Rise Gold, Inc, in response to the comments from the Northern Sierra Air Quality Management District, NSAQMD: "Pursuant to Health and Safety Code section 41 511 and the ATCMs (discussed below), the NSAQMD will require that an asbestos sampling plan be developed and approved by the NSAQMD prior to its implementation. It should at least meet the requirements and specifications of ARB Method 435 (see <https://www3.arb.ca.gov/toxics/asbestos/tm435/tm435.htm>). This has not been done. No sampling plan has been developed and approved by the NSAQMD." (Letter between Air Pollution Control Officer of NSAQMD and Matt Kelley, Senior Planner Nevada County, February 10, 2021)

Rise Gold is listed as the author- no credentialed expert is credited even though they have a PhD Geologist on their team along with several Technical Advisors who are also geologists.

Rise Gold Inc. is incorporated in the state of Nevada. The state of Nevada does not require a license for geologists.

**Ind 634-2**

The sampling plan seems to be derived from "Air Resources Board Method 435, Determination of Asbestos Content of Serpentine Aggregate (1991)". CARB also published the "IMPLEMENTATION GUIDANCE DOCUMENT Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate" in April 2017 to further elucidate the complexities of asbestos testing in an effort to increase consistency and reliability between laboratories. The document states that: "If all parties involved in the collection, processing, and analysis of potential asbestos containing aggregate follow the guidelines specified in this document, more accurate and repeatable M435 asbestos content measurements will result." (IMPLEMENTATION GUIDANCE DOCUMENT Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate, April 2017, pp i-ii)

**Determine what, if any of these recommendations were implemented**

The sampling and testing will be done by Rise. "Sampling and analytical testing will be done on or off-site by trained and qualified persons under the direction of a State Licensed Geologist" (ASUR Plan, Item #6, document pg 14 or pg 16 of 131). Laboratories analyzing asbestos are accredited by NLVAP (National Laboratory Voluntary Accreditation Program). A licensed geologist can work with an Air Pollution Control Officer to identify naturally occurring asbestos (NOA) and create a management plan.

**Ind 634-3**

Was the author of the ASUR Plan a California licensed geologist?

So, the parties involved in sampling and testing are not well established as written in the ASUR Plan.

**Can the geologist perform testing themselves, train analysts to perform testing or supervise testing? Will any of this work be accepted in a court of law? TBD from a regulatory agency**



Mossman is not a licensed Professional Geologist or Certified Engineering Geologist in the state of California. None of the following members of the Rise Gold management team could be found in DCA database for licensure: Thomas Vehrs, Bob Gallagher, Mike Andrews, John Carlile or Alan Edwards (all listed as directors or technical advisors; searches performed under EG-Certified Engineering Geologist, GEO-Professional Geologist, GP-Professional Geophysicist, HG- Certified Hydrogeologist, and MT-Metallurgical Engineer categories). They all have extensive experience in mining, especially international work.

Andrew Kopania (author of the *Groundwater Hydrology and Water Analysis for the Idaho-Maryland Mine Project*) along with Vieira and Kull (NV5 authors of the *GeoTechnical Reports for Centennial and Brunswick Industrial Sites*) were located in the DCA database in order to validate search abilities.

The *Asbestos Sampling Memo (June 2020)* was prepared by Richard Lippoth. He collected the samples from Rise, analyzed the laboratory data and prepared the report. No California licensure is found for him under the Board for Professional Engineers, Land Surveyors and Geologists, DCA.ca.gov He is a one man show at Vergence Geo Services, Inc. with his resume listing work with Freeman-McMoran and Alexco, a shared history with the Rise management team. His qualification described in the *Asbestos Sampling Memo June 2020* is listed as geologist, Mr. Richard Lippoth, Reg. SME. SME is a professional organization: the Society for Mining, Metallurgy and Exploration.

## COMPARISON OF PCM TO PLM TO TEM MICROSCOPY TECHNIQUES

Multiple types of microscopy techniques will be used to analyze asbestos content depending on the application of the results. For instance, airborne asbestos monitoring for miners' exposure will use air filtration capture followed by phase contrast microscopy analysis.

Bulk materials will be screened for asbestos using polarized light microscopy followed by transmission electron microscopy analysis for rolling inventory maintenance.

"TEM is the preferred analytical method for outdoor asbestos samples because of its ability to detect small fibers (greater than or equal to 0.0002 microns in diameter) and to distinguish between asbestos fibers and non-asbestos fibers. The term "TEM structures" is often used to describe asbestos fibers detected by this method. TEM is the method recommended by the California Office of Environmental Health Hazard Assessment (OEHHA). However, TEM measurements cannot be directly related to the cancer potency factors because the studies upon which OEHHA's risk assessment was based used PCM analysis. Thus, the TEM measurements must be converted to PCM-equivalent units (OEHHA 2015.)" (*ASUR Plan, document pp 7 or pp 9 of 131*)

"Asbestos content by TEM structures will be converted into equivalent Phase Contrast Microscopy (PCM) units in accordance with the California Office of Environmental Health Hazard (OEHHA) 2015 Air Toxic Hot Spot Guidance Manual." (*ASUR Plan, Item #3, document pp 8 or pp 10 of 131*)

These different analyses each require unique sampling methods, sample preparation, sample sizes, and microscopy techniques. The results are not directly comparable between the methodologies.

## PHASE CONTRAST MICROSCOPY (PCM)

"The most common methodology used for asbestos air testing is Phase Contrast Microscopy (PCM). This testing method involves using a PCM microscope to count the fibers present on the cassette filter in order to determine if the total fiber concentration is less than the EPA clearance level of 0.01 fibers/cc (fibers per cubic centimeter) "Asbestos sampling protocol cannot be used for objective data - OSHA." (<https://www.osha.gov/https://www.fda.gov/oc/ohrt/2015-10-07>). Phase contrast microscopy enhances the contrast of transparent materials, while also filtering out background light. The air cassettes used for PCM contain a cellulose ester filter with a pore size of 0.8 um. Once the air sampling is complete, the sample is sent to an accredited laboratory. Alternatively, the samples can be analyzed on-site with a microscope for expediency, but these results will not be accredited. Whether in a lab or on-site, the filter is cut into a pie shape and prepped using a mix of vaporized acetone and triacetin. The sample is then placed on a PCM microscope where the fibers are counted up to 100 fields of view." ([www.indoorscience.com](http://www.indoorscience.com), [PCM vs TEM Asbestos Air Testing - Indoor Science, March 27, 2018](#))

Advantages:

Ind 634-4

Ind 634-5



- Technique is specific for fibers. It is a fiber counting technique which excludes non-fibrous particles from the analysis
- Technique is inexpensive and does not require specialized knowledge to carry out counts
- Analysis is quick and can be performed on-site for rapid determination of air concentrations of asbestos fibers
- Technique has continuity with historical epidemiological studies so that estimates of expected disease can be inferred from long-term determinations of asbestos exposure

Disadvantages:

- Test does not positively identify asbestos fibers. Other fibers may be included unless differential counting is used
- The smallest visible fibers are about 0.2µm in diameter while the finest asbestos fibers may be as small as 0.02 µm in diameter. For some exposures, substantially more fibers may be present than are actually counted.
- Cannot distinguish fibers less than 5 microns in length and 0.25 microns in width

This method is used for airborne fiber determination, not bulk material. It will probably be used for workers' exposure testing. Since OEHHA asbestos risk assessment has used studies involving PCM analysis, TEM results from bulk testing will be converted to PCM equivalent units.

#### POLARIZED LIGHT MICROSCOPY (PLM)

The following method description is excerpted from the Asbestos TEM Laboratories, Inc. cover letter dated Sep/17/2019 found in the *Asbestos Sampling Memo June 2020, pp 26 of 32*: "Sample preparation follows a standard CARB 435 prep method. The entire sample is dried at 135-150 C and then crushed to ~3/8" gravel size using a Bico Chipmunk crusher. If the submitted sample is >1 pint, the sample was split using a 1/2" riffle splitter following ASTM Method C-702-98 to obtain a 1 pint aliquot. The entire 1 pint aliquot, or entire original sample, is then pulverized in a Bico Braun disc pulverizer calibrated to produce a nominal 200 mesh final product. If necessary, additional homogenization steps are undertaken using a 3/8" riffle splitter. Small aliquots are collected from throughout the pulverized material to create three separate microscope slide mounts containing the appropriate refractive index oil. The prepared slides are placed under a polarizing light microscope where standard mineralogical techniques are used to analyze the various materials present, including asbestos. If asbestos is identified and of less than 10% concentration by visual area estimate then an additional five sample mounts are prepared. Quantification of asbestos concentration is obtained using the standard CALARB Method 435 point count protocol. For samples observed to contain visible asbestos of less than 10% concentration, a point counting technique is used with 50 points counted on each of eight sample mounts for a total of 400 points."

This is a generalized description of the PLM analysis method, actual processes are not documented in the Asbestos Sampling Report June 2020 for the individual samples.

Advantages:

- Basic identifications were first performed by light microscopy so there is a large base of published information against which to check analysis and technique
- Analysis is specific to fibers
- Analysis is quick, requires little prep time and can be performed on-site if equipment is available

Disadvantages:

- Not all fibers present may be seen. This is a problem for very low asbestos concentrations where agglomeration or large bundle of fibers may not be present to allow identification by inference.
- Method requires a great degree of sophistication on the part of microscopist. An analyst is only as useful as his mental catalog of images. Therefore, a microscopist's accuracy is enhanced by experience. The mineralogical training of the analyst is very important. It is the basis on which subjective decisions are made.
- The method uses only a tiny amount of material for analysis. This may lead to sampling bias and false results (high or low). This is especially true if the sample is severely inhomogeneous. (heterogeneity)
- Fibers may be bound in a matrix and not distinguishable as fibers so identification cannot be made

#### TRANSMISSION ELECTRON MICROSCOPY (TEM)

The following method description is excerpted from the Asbestos TEM Laboratories, Inc. cover letter dated Aug/15/2019 found in the *Asbestos Sampling Memo June 2020, pp 21 of 32*: "Sample preparation followed a standard CARB 435 prep method. The entire sample was dried at 135-150 C and then crushed to ~3/8" gravel size. If the submitted sample was >~1 quart, the sample may have been split using a 1/2" splitter following ASTM Method C-702-98 to reduce the sample volume for pulverization. The remaining aliquot, or entire original sample, was then pulverized in a Bico Braun disc pulverizer calibrated to produce a nominal 200 mesh final product. A representative ~60 mg aliquot of material was weighed out, and then placed into solution in a 500 ml beaker filled with distilled water. A known volume of the liquid suspension was filtered onto a 0.2 micron pore size Millipore mixed cellulose ester filter. The filter was then dried in HEPA filtered, Class 100 air on a clean bench. The filter was placed onto a glass microscope slide, sectioned, and collapsed in acetone. The collapsed filter was plasma-etched to remove 10% of the filter surface and then carbon coated. The carbon coated filter was sectioned

Ind 634-6

Ind 634-7





and the sections placed onto 200-mesh copper TEM sample grids in dimethyl sulfoxide and acetone wick washers. After sufficient time to dissolve the filter material, the TEM sample grids were removed from the baths and placed into labeled sample containers.

TEM analysis was performed on a Philips CM-12 or JEOL 1200 transmission electron microscope operating at 80 or 100 kV. The sample was placed into the microscope where it was first scanned at low magnification to confirm that the distribution of material was reasonably homogeneous. High magnification analysis was performed using a two tier approach: 1) A relatively large area of several TEM grid openings for large asbestos fibers or fiber bundles, and 2) a relatively small area of a number of fields of view for individual asbestos fibers (fibrous particles exhibiting an aspect ratio greater than or equal to 3 to 1, and a length greater than or equal to .5 um). Detected asbestiform structures were subjected to detailed morphological and/or selected area diffraction analysis. If necessary, energy dispersive X-ray analysis was also performed. The length and width of each asbestos fiber was measured. From this data, a total volume and mass of asbestos observed in the scanned area is calculated, and extrapolated to a total weight percent asbestos for each sample."

At the top of the same letter is the statement: "Please find below the results for the TEM analysis of one or more bulk material samples. The analytical procedures were performed according to the EPA Test Method For the Determination of Asbestos in Bulk Building Materials - TEM method (EPA 600/R-93/116) modified for quantitative bulk soil sample analysis."

How was this method for bulk building materials modified for bulk soil sample analysis? These are rock cores.

In these analyses, an ~60 mg sample was suspended in 500 ml distilled water. Then a 0.5 ml aliquot was filtered for analysis. While TEM can identify fibers too small to be seen with PLM, the sample size is reduced by order of magnitude, 10<sup>6</sup>.

"Samples are first analyzed using PLM because a much larger (and likely more representative) mass of sample powder is analyzed using PLM than when using TEM. The mass of a M435 sample analyzed by PLM is approximately one million times greater than the mass of a TEM sample, but TEM has a resolving power of 500 to 20,000X magnification (compared to 50 to 1000X magnification by PLM). This higher resolving power enables TEM microscopists to distinguish and identify finer particles and fibers not seen with the use of PLM. For example, the California Department of Toxic Substances Control has used PLM, followed by TEM, as part of a tiered analytical approach to verify the absence of asbestos fibers determined by M435 PLM analyses in its Schools Program." (IMPLEMENTATION GUIDANCE DOCUMENT Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate, April 2017 pp 23-24)

This is a "potential" quantity of mass available for analysis by PLM vs TEM, not the actual mass analyzed.

Advantages:

- Fibers can be accurately identified-ability to distinguish between asbestos and non-asbestos fibers
- Small fibers can be detected

Disadvantages:

- High resolution may be selective for a specific size fiber and exclude others
- Actual amount of material examined is magnitudes less than quantity examined by PLM
- Sample heterogeneity impacts overall representativeness

Bottom line is that these methods are not comparable due to differences in sample preparation and microscopy techniques. These analyses contain inherent bias due to sample variability (lack of homogeneity), differences in sample quantities tested, magnification levels and individual microscopists' expertise.

COMPARISON OF RESULTS FROM ASBESTOS SAMPLING MEMO (June 2020) TO ASUR PLAN TEM RE-TEST (Nov 2021):

For the 42 samples analyzed during August and September 2019, asbestos was detected in 4 samples, 9.5% of total samples. This included two blanks, two Centennial site tailings and 38 rock core samples. Two samples were analyzed by TEM and the remaining 40 samples by PLM. Asbestos was found in the two TEM samples and two of the PLM samples.

"In 2021, Rise requested the 40 samples previously submitted to be reanalyzed using the TEM method." (ASUR Plan, document pp 7 or pp 9 of 131).

Actually, the TEM reanalyses were performed at the urging of the air district: ["As the NSAQMD wrote in its July 10, 2020 comments "The NSAQMD recommends additional TEM analyses of the above rock types (serpentine, weakly ankeritized diabase/serpentine, weakly ankeritized serpentine and ankeritized serpentine) in order to facilitate refinement of the preliminary risk assessment". The NSAQMD still sticks to this recommendation"]. (Letter between Air Pollution Control Officer of NSAQMD and Matt Kelley, Senior Planner Nevada County, February 10, 2021)

In retesting of the 40 samples (two tailings and 38 pulp samples) analyzed by TEM, asbestos was detected in 14 samples. Unfortunately, the August 2019 samples tested by TEM were not retested by TEM in 2021. Thus, there is no quality control data regarding variability and reproducibility of results regarding TEM analysis between those two samples. The following chart is a comparison of asbestos found by TEM vs PLM. Detection limit for PLM is 0.25 weight% and the detection limit for TEM is 0.001 weight %. Non-detect samples from TEM re-testing have been excluded.

Ind 634-8

Ind 634-9



Sample Number	Date Reported	PLM Result weight % Detection Limit 0.25	TEM Result weight % Detection Limit 0.001	% Difference PLM vs TEM	Location and sample drill core length (inch)	PCM equivalent units weight %
Y962827	Sept 17, 2019	<0.25		139	I-19-14 4.8	
	Nov 10, 2021		1.4			0.021
Y962828	Sept 17, 2019	<0.25		120	I-19-14 3.6	
	Nov 10, 2021		0.062			0.0
Y962833	Sept 17, 2019	<0.25		92	I-19-14-A 3.6	
	Nov 10, 2021		0.092			0.0
Y962835	Sept 17, 2019	<0.25		112	I-19-14A 3.6	
	Nov 10, 2021		0.071			0.0
Y962836	Sept 17, 2019	<0.25		15	I-19-14A 3.6	
	Nov 10, 2021		0.29			0.0
Y962837	Sept 17, 2019	<0.25		134	I-18-11 4.8	
	Nov 10, 2021		1.27			0.018
Y962840	Sept 17, 2019	<0.25		50	I-19-14 4.8	
	Nov 10, 2021		0.15			0.001
Y962843	Sept 17, 2019	<0.25		193	Centennial tailings	
	Nov 10, 2021		0.004			0.0
Y962847 Duplicate	Sept 17, 2019	<0.25		55	I-19-13 13.2	
	Nov 10, 2021		0.44			0.028
Y962980	Aug 15, 2019	N/A	3.1	N/A	I-18-11 10.8	0.035
	N/A					
Y962981	Aug 15, 2019	N/A	2.0	N/A	I-19-13 13.2	0.028
	N/A					
Y962991	Sept 17, 2019	<0.25		142	I-18-11 6.0	
	Nov 10, 2021		0.042			0.042
Y962992	Sept 17, 2019	0.75		5	I-18-11 3.6	
	Nov 10, 2021		0.79			0.069
Y962993	Sept 17, 2019	<0.25		198	I-19-13A 4.8	
	Nov 10, 2021		0.0009 (0.001 at 3 sf)			0.003
Y962994	Sept 17, 2019	<0.25		63	I-19-13A 4.8	
	Nov 10, 2021		0.13			0.0
Y962999	Sept 17, 2019	2.5		164	I-19-13A 4.8	
	Nov 10, 2021		0.01			0.038

Overall, 16 samples, 40%, had asbestos greater than the TEM detection limit of 0.001 weight %.

Eight of the 40 samples, 20%, had asbestos >0.01 PCM equivalent units Weight %.

NOTE: sample Y962994 had a TEM result of 0.13 weight % yet zero result for PCM equivalent units. Data was noted: "Actinolite asbestos detected. Concentration per Millions of Fibers per gram: 29 for fibers >5µm in length. Possible contamination." This same situation occurs for samples Y962828, Y962833, Y962835, Y962836 and Y962843.

Two samples for TEM analysis originally sent to the laboratory on Aug 8, 2019 were described as rock cores with date analyzed as Aug 15, 2019. The 40 samples for PLM analysis were described as rock cores and were originally sent to the laboratory on Sept 3, 2019 with date analyzed as Sept 17, 2019. For retesting, 40 samples described as pulverized rock were submitted to the laboratory on Sept 14, 2021 with date analyzed as Nov 10, 2021. The two samples originally tested by TEM, Y962980 and Y962981, were not retested in November 2021. All of these samples were stored somewhere for two years before being retested. The actual age of the samples is unknown since drill core logs are not available. Rise performed exploratory drilling between 2017-2019.

#### SAMPLE POPULATIONS

Not counting the two grab tailings samples from the Centennial Site and the two blanks (carbonate landscape rock), the average overall length of the sample cores tested was 5.34 inches. Samples were from 6 of 19 (32%) of total cores drilled by Rise: 9 samples from I-18-11, 1 sample from I-18-12, 9 samples from I-19-13, 7 samples from I-19-13A, 8 samples from I-19-14 and 4 samples from I-19-14A. Drilling was stopped when asbestos was detected. Drill logs are not available; therefore, it is impossible to determine the depth or width of serpentinite deposits encountered. Asbestos sampling was extremely limited. Centennial tailings were only identified by a grid number-no information as to quantity, location, depth, etc. There are labeling errors: 1) *Asbestos Sampling Memo June 2020, Appendix A*-First photo is mislabeled Y962880 instead of the correct label Y962980 and 2) sample Y962838 is located on drill hole I-19-12 on Sheet 2

Ind 634-10





Mine Geology and Asbestos Samples (*Asbestos Sampling Memo June 2020*) but is listed as being from drill hole I-18-12 in the *ASUR Plan, Appendix C, pp 55 of 131*.

#### DUPLICATE ANALYSIS

Y962847 and Y962981 are duplicate samples. How does a result of 0.44 TEM weight % and 2.0 TEM weight % calculate out to the same PGM equivalent unit result of 0.028 weight%? (*ASUR Plan, Appendix C, document pp 57 of 131*)

These two separate samples Y962981 and Y962847 were quality control duplicates. These were two different samples. Y962981 was initially received as a rock core sample and was only analyzed by TEM on 8.15.19. The results yielded 22 chrysotile structures <5µm and 17 structures ≥ 5µm with a calculated asbestos concentration (weight %) of 2.0 (*Asbestos Sampling Memo, June 2020, Appendix B, pp 23 of 32*).

The duplicate sample, Y962847 was initially received as a pulps sample and was tested by PLM on 9.3.19 with <0.25% result. This sample was retested by TEM on 11.10.2021 and yielded 233 chrysotile structures <5µm and 10 structures ≥ 5µm with a calculated asbestos concentration (weight %) of 0.44 (*ASUR Plan, Appendix B for Asbestos TEM Laboratories Report, pp 110 of 131*).

Ind 634-11

Yet, the *ASUR Plan* lists these results as identical with the same Structures/nanogram at 3.0 and the same PGM Weight % at 0.028% (*ASUR Plan, Appendix C, pp 57 of 131*)

The weights used for sample preparation are 62.5 mg for Y962981 and 58.9 mg for 962847, a difference of 5.9%. But the difference in calculated asbestos weight concentration is 128%. Sample Y962847 has more than 10 times the number of chrysotile structures.

A 6% lower weight yields a 10 times higher structure count but the same PGM equivalent units????

Only one of these samples was included in the four total samples used to calculate the content in serpentinite samples. Which one? Who picks which one? Can the quality control sample, as a separate sample, be excluded from the analyses? (*ASUR Plan, Appendix C, pp 57 of 131*)

Comparing the results for the duplicate sample, Y962847, by TEM analysis yields 0.44% by weight compared to sample, Y962981 at 2.0% by weight, again yielding a 128% difference. Even using the same analytical test procedure (TEM analysis) yields unsatisfactory QC results.

NOTE: The only definitive conclusion from all of the asbestos testing is that: asbestos was found in all of the serpentinite samples in addition to being found in samples of weakly ankeritized diabase/serpentinite, weakly ankeritized serpentinite, diabase and porphyrite at levels >0.01% PGM equivalent units (*ASUR Plan, Appendix C, pp 55-57 of 131*).

Grouping the samples by lithology in an effort to dilute the overall asbestos content of the group does not negate the asbestos content of the individual sample and its potential for harm. (*ASUR Plan, Appendix C, pp 54 of 131*)

#### QUALITY CONTROL ISSUES

The laboratory report for retesting of 40 sample by Asbestos TEM Laboratories, Inc. is labelled Report NO. 375516 rev.1

Why was the report revised? Where is the original for comparison?

Ind 634-12

Per documentation provided, no blind blanks or blind duplicates were performed. No documented cross check verifications from second analyst or second microscope were performed on individual samples. Two analysts performed the 40 sample TEM re-tests. The first analyst tested the first 18 samples, followed by the second analyst for next 13 samples, first analyst again for one sample, second analyst for remaining 8 samples. No time stamp for each sample, thus unable to determine if samples were analyzed in the order listed according to laboratory sample ID.

Two of the TEM samples had grid opening damage, Y962984 and Y962988.

Eight of the 40 samples were notated as having "possible contamination" with two types of contamination listed, chrysotile for two samples and actinolite for 6 samples. Twenty percent of the samples had "possible contamination", 5% by chrysotile and 15% by actinolite.

#### TOXICITY

Ind 634-13

#### CHRYSOTILE VS AMPHIBOLE ASBESTOS

What if these samples did not have "possible contamination" but contained actual naturally occurring actinolite (amphibole) asbestos?



Ind 634-14

Upon retesting by TEM, ten samples (25%) indicated amphibole asbestos which has a much higher cancer potency than chrysotile asbestos.

Particularly controversial is the question of whether chrysotile asbestos is less potent for the induction of lung cancer than the amphibole forms of asbestos (e.g. crocidolite, amosite and tremolite), which has sometimes been referred to as the "amphibole hypothesis" (Caillen, 1996; Stayner et al., 1996; McDonald, 1996). This argument is based on the observation from experimental studies that chrysotile asbestos is less biopersistent (i.e. has a shorter half life) in the lung than the amphiboles... [The Working Group noted that the lower biopersistence of chrysotile in the lung does not necessarily imply that it would be less potent than amphiboles for lung cancer.] <https://www.ncbi.nlm.nih.gov/books/NBK304374/>

"The amphiboles are more likely to be associated with mesothelioma than is chrysotile, or white asbestos, which has a two to four times less potent risk of mesothelioma; however, the risk for development of lung cancer is equipotent for all types of asbestos. Chrysotile accounts for more than 99% of the world production of asbestos and commonly is contaminated with tremolite and other asbestos fibers." (Walker MD, Christopher, Pleural Neoplasms, Muller's Imaging of the Chest, 2019 Retrieved from ScienceDirect.com 02.22.2022)

#### POTENTIALLY TOXIC ELEMENTS

Potentially toxic elements (PTEs) hosted in asbestos elongate mineral particles is one of the factors that determines their toxic/pathogenic effects. Metals such as Fe, Mn, Cr, and Be are known to induce toxicity and contribute to asbestos related diseases. "...it is essential to quantify the toxic elements present in asbestos elongate mineral particles in order to prevent asbestos-related diseases." <https://doi.org/10.1016/j.chemgeo.2020.119896>

"Iron ions on amphibole types of asbestos react with epithelial lining fluid in the lung and generate reactive oxygen species that induce toxicity, and oxidant stress may lead to DNA damage. There is a direct relationship between biopersistence, which is determined by fiber length and chemical composition, and toxicity. Longer, thinner fibers are more toxic because they are not cleared by the AMs and therefore persist in the lung. Fibers longer than 1.5µm are particularly toxic and bioactive. They are not completely engulfed by the macrophages, leading to release of lysosomal contents, cytotoxicity, oxidant stress, and stimulation of inflammatory and growth factor pathways." (Harkema...Haschek, Fundamentals of Toxicologic Pathology, Chapter 14-Respiratory System (Third Edition), 2018 pp 351-393, Retrieved from ScienceDirect 02.22.2022 <https://doi.org/10.1016/B978-012-809841-7.00014-9>)

Many of these samples have high metals content, especially iron. [Chart this](#)

Ind 634-15

The data used for heavy metal toxic air contaminants in the Health Risk Assessment are all notated by the laboratory as being received and tested beyond the EPA recommended hold times of 28 days for mercury and 6 months for all remaining metals. Exploratory drilling began in 2017. Since the drill logs are unavailable, the exact sample dates for each core are unknown, but all samples were submitted and received by the gold assay laboratory on February 20, 2019. (Inorganic Extended Qualifier Reports pp. 389-407 and 458-484, Appendix D, Groundwater, Hydrology and Water Quality Analysis Report-Appendices)

After assays were performed, samples were then submitted to ACZ Laboratories for metal analyses. These analyses were performed in November 2019. This means that all samples were tested at least 9 months beyond their expiration date, probably more.

Shouldn't valid data be used when evaluating the health risks to the community from these TACs, especially when these metals have to ability to potentiate the effects of asbestos?

#### MATERIAL SAMPLING LOGISTICS

"The sampling will be done from the transfer point between the skip and silo and may be taken either manually or with an automated sampler." Illustrated by Figure 2 (ASUR Plan, document pp 14 or pp 16 of 131)

Ind 634-16

According to correspondence between the Air Pollution Control Officer of NSAQMD and Matt Kelley, Senior Planner of Nevada County on February 10, 2021, the APCO states: "A key component of method 435 is the protocol for collecting representative samples. It is improper to simply pull out the laboratory portion of Method 435 and say that Method 435 is being used. Method 435 states, "1.2 Applicability. This method is applicable to determining asbestos content of serpentine aggregate in storage piles, on conveyor belts, and on surfaces such as roads, shoulders and parking lots." Then it specifies even more clearly, "3 APPLICABLE SOURCES. This method can be used to obtain bulk material sources from three types of sources: 1. Serpentine aggregate storage piles. 2. Serpentine aggregate conveyor belts 3. Serpentine aggregate covered surfaces...In aggregate, a large degree of homogeneity has already been achieved during the aggregate's production."

Does pulling samples at the skip drop point into the silo meet the above stipulated criteria for Method 435 sampling, does this method qualify as a conveyor belt?

Ind 634-17

Who would be in the silo at point 3 in diagram as shown on document pp 14. (ASUR Plan) to obtain a sample manually?

Ind 634-18

"It is recommended that sampling be done at point closest to end of processing." (IMPLEMENTATION GUIDANCE DOCUMENT Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate, pg ii).



Ind 634-19

This point in the silo may be adequate for barren rock samples but not tailings samples comprised of ore rock regarding the "point closest to end of processing," as stated above.

What will be the timing/spacing of the individual 3 samples taken for each composite per 1000 tons? Beginning, middle, end or every 333 tons? Beginning and end sampling method would mean that samples would overlap (beginning, end) and (end, beginning) samples per 1000 tons. Weighting sampling at these points would not be representative of the entire batches.

Will barren rock and ore rock be analyzed separately or combined in a composite (3 samples will be composited per 1000 tons of rock each day (ASUR Plan, document pp 13 or 15 of 131)? If barren rock and ore rock are to be placed in different compartments of the concrete silo, how will you be able to determine which material is contaminated, if asbestos content >0.01% PCM equivalent units is later found in the rolling inventory?

The concrete silo is divided into three compartments, one 1000 tons area and two 400 tons containment areas. The ore rock would flow through the larger compartment and then be conveyed to the ore processing plant for pulverization into tailings, while the barren rock would be loaded into haul trucks for transport.

How would you determine if the contaminated material was from the ore rock or the barren rock if the composited sample contains both materials? Rise would have to assume that all material from last non-detect test (per 1000 tons batch) to the next non-detect test (per 1000 tons batch) is contaminated.

Using a weighted average taken over three months of 1000 tons per day ore rock (90,000 tons) and 500 tons per day barren rock (45,000 tons) allows for significant dilution of asbestos per batch. Will an individual batch that fails TEM analysis be allowed to remain among the passing TEM analyses batches?

#### ROLLING INVENTORY MAINTENANCE LOGISTICS

Pg 13 (pp 15 of 131), ASUR Plan item 4: "Analytical determination of a materials status as Asbestos Containing Material would be done using Polarized Light Microscopy (PLM) in accordance with ARB Method 435 pursuant to 17 CCR 93106 (h)(2) with a detection limit of 0.25% asbestos"

Pg 13 (pp 15 of 131), ASUR Plan item 5: "Analytical determination of asbestos content, for the purposes of maintaining an Asbestos Inventory, would be done using Transmission Electron Microscopy (TEM) method in accordance with the EPA/600/R-93/116 method. Sampling for the Asbestos Inventory would be done by compositing at least 3 random grab samples from the barren rock or sand tailings for every 1000 tons of material."

Ind 634-20

But on page 8 (pp 10 of 131) of the ASUR Plan are the statements:

4) An Asbestos Inventory of all mined materials will be maintained and include a 3-month rolling average of asbestos content in equivalent PCM units.

5) An Engineered Fill Placement Plan will be maintained to ensure that adequate non-Asbestos Containing Material, as determined by PLM testing, is available for Surfacing Applications.

If all mined material is tested by TEM and converted to PCM equivalent units, then how can Rise maintain an Engineered Fill Placement Plan based just on PLM testing? There is no comparison or conversion factors of PLM measurements to TEM measurements. (Only TEM measurements are used to convert to PCM equivalent units)

"A rolling three-month weighted average of asbestos content of mined materials brought to surface and materials used as Engineered Fill will be maintained in the Asbestos Inventory. (ASUR Plan, document pp 15 or 17 of 131)."

"Arrangements will be made to ensure that analytical data is received and entered into the inventory within 2 weeks of sampling" (ASUR Plan, pp 15 or 17 of 131)

Ind 634-21

Will a new weighted average be calculated with each 1000 tons of material added to the inventory? WHERE WILL THIS MATERIAL BE STORED? WILL 1000 TON INDIVIDUAL BATCHES OF ORE ROCK ALONG WITH 500 TONS INDIVIDUAL BATCHES OF BARREN ROCK BE MAINTAINED? HOW MUCH MINING WILL BE PERFORMED DURING THAT TWO WEEKS OF TURN AROUND TIME? HOW WILL THE AMOUNT OF "POSSIBLY CONTAMINATED" MATERIAL BE DETERMINED?

For example, Y962847, would have initially passed the screening PLM method of testing. However, the material would have failed when tested by TEM during rolling inventory. Material surrounding this sample in the 90-day rolling inventory would be unfit for engineered fill or aggregate transport.





	<p>↑</p> <p>WILL THE SAME SAMPLE ANALYZED BY PLM BE RE-TESTED USING TEM OR WILL RANDOM SAMPLES FOR EACH TEST (PLM and TEM) BE UTILIZED?</p>
<b>Ind 634-22</b>	<p>FUGITIVE DUST EMISSIONS ABOVEGROUND</p> <p>The 3-month rolling inventory will consist of 1000 tons of tailings for engineered fill per day multiplied by 90 days equals 90,000 tons plus 500 tons of barren rock for engineered fill per day multiplied by 90 days equals another 45,000 tons. 500 tons of tailings will be deposited underground in CPB.</p> <p>How will the 500 tons designated for CPB be determined? How will this material be culled from the rolling inventory? (Assuming that any tailings containing asbestos would be the most suitable for underground CPB placement)</p>
<b>Ind 634-23</b>	<p>Where will this 135,000 tons of materials be stored and how will it be loaded for transport to Centennial, Brunswick or outside vendors? Have the fugitive dust emissions for the storage and loading been calculated and included in PM emissions analysis and incorporated into Health Risk Assessment model?</p>
<b>Ind-24</b>	<p>The Air Quality Report calculates emissions based on loading from an enclosed area: "Barren rock will be transported from the concrete silo using a series of chutes and conveyors to a fully enclosed truck loading building." (<i>Air Quality and Greenhouse Gas Emissions Analysis, Appendix B, Health Risk Assessment, Earthwork and Material Handling Nov 2021, document pp 24</i>) This statement does not account for rolling inventory procedures.</p>
<b>Ind 634-25</b>	<p>On document page 35, <i>Noise and Vibration Report, Rock Bin Conveyors and Barren Rock Loading</i> is the statement: "The existing concrete rock silo will be reused. A chute and conveyor system will transfer barren rock from the silo into trucks for transport as engineered fill. The conveyor system and truck loading area will be inside a building adjacent to the headframe. A chute and covered conveyor system, approximately 335 feet long, will transfer gold mineralization from the silo to the process plant."</p> <p>On document page 11, <i>Centennial GeoTechnical Report</i>: "The conveyor system and truck loading area will be inside a small building adjacent to the headframe."</p> <p>On document page 14, <i>Centennial GeoTechnical Report, Table 4, Buildings</i> lists the Rock Truck Loading building as 1700 square feet with a maximum height of 20 feet.</p> <p>Is the building large enough to accommodate the 45,000 tons of barren rock rolling inventory and room for front-end loading into haul trucks from that inventory? What is the ventilation system for this building?</p>
<b>Ind 634-26</b>	<p>On document page 36 <i>Noise and Vibration Report, Process Plant</i> is the statement: "Gold mineralization hoisted from the Brunswick shaft will be placed in the existing concrete silo located on the Brunswick property before processing begins. Gold material will be transported from the concrete silo using chutes and conveyors to a fully enclosed process plant....Sand tailings (waste) from the gold recovery process will be dewatered and used for either backfill for the underground mine or stockpiled for transport and use as engineered fill. Sand tailing during backfilling will be transferred to the paste backfill plant, where particles will be dewatered and mixed with cement into a paste....Sand tailings not used for backfill will be either directly loaded into trucks in the process plant or stockpiled inside the building. Stockpiled sand tailings will be loaded into transport trucks with a front-end loader during daytime hours. Sand tailings not used as underground backfill will be transported for use as engineered fill."</p> <p>(Document pp 39, <i>Noise and Vibration Report, Table 9 Hours of Operation</i>): "Outside Truck Loading by Loader 7:00 AM-7:00 PM, 7 Days a Week, 80 years"</p> <p>(Document pp 17, <i>Applicants Project Description, Table 7, Hours of Operation</i>): "Outside Truck Loading by Loader 7:00 AM-7:00 PM, 7 Days a Week, 80 years" This is confirmation of "outside loading" across documents.</p> <p>Will this loading occur inside or outside? Will it be stockpiled inside or outside? If these procedures change due to maintenance of rolling inventory storage: will noise levels increase, will amounts of fugitive dust increase? What is the potential for all equipment and storage areas to be contaminated with asbestos? What level of asbestos found by TEM testing in the 90 day rolling inventory will trigger decontamination of all equipment: conveyor belts, processing plant, cement plant, etc.?</p>
<b>Ind 634-27</b>	<p>Will these two components of the engineered fill be kept separate? Otherwise, how will the engineering firm determine correct ratios for mixing to ensure stability upon engineered fill placement?</p> <p>Recommendations from NV5: "2. Crushed blast rock with a maximum dimension of 6 inches may be blended into the sand tailings to produce engineered fill material at a ratio of up to 2 parts blast rock to 1 part sand tailings. A rock and sand ration greater than 2:1 may be feasible but would not likely be testable using nuclear methods. 4. Onsite blending of blast rock and sand tailings may be performed by earthwork equipment (e.g. windrowing and spreading the rock and sand together in thin lifts). Specific procedures for onsite blending should be developed in conjunction with an NV5 representative during initial fill placement." <i>Centennial GeoTechnical Report, document pp 13</i></p> <p>↓</p>



	<p>Document pp 16. <i>Centennial GeoTechnical Report</i>: "Engineered fill may be mixed on site using mobile equipment to ensure uniformity and meet specifications for compaction."</p>
	<p>FUGITIVE DUST EMISSIONS UNDERGROUND</p>
Ind 634-28	<p>"The walls and roof of tunnels composed of rock containing significant asbestos will be covered with shotcrete and the floor with be covered with either concrete or 3 inches of non-Asbestos Containing Material. Shotcreting would be done as part of the tunneling cycle or after completion of tunneling. Floor covering would be done after completion of tunneling (<i>ASUR Plan, document pg 10 or pp 12 of 131</i>),"</p> <p>How much cement does this add to mine operations and subsequent GHGs? Hexavalent chromium deposition? What level of asbestos is considered significant to warrant shotcrete?</p>
Ind 634-29	<p>DEIR pg 3-3B Lists a "Shotcrete Machine" that will "Spray concrete into the walls of the galleries to prevent rockfall." Is shotcrete to be used on all tunnels and not just significant asbestos areas?</p>
Ind 634-30	<p>"Water generated from drilling and dust suppression during tunneling in Asbestos Containing Material shall be collected in sumps or tanks and shall not be used for Surfacing." (<i>ASUR Plan, document pp 11 or pp 13 of 131</i>)</p> <p>(<i>ASUR Plan, document pp 12 or pp 14 of 131</i>): "#6. Rock loads will be wetted for transit between the tunnelling and dumping area and equipment will be washed regularly to prevent dust from being tracked out into other areas of the mine."</p> <p>How will this water be treated to remove asbestos? What will be the volume of asbestos contaminated water?</p>
Ind 634-31	<p>MERV 16 filters will remove 95% of fibers...that still leaves 5 % ... Rise claims that only 1% of material mined will be serpentinite.</p> <p>Will MERV 16 filters be limited to serpentinite mining only? What type of filters will be utilized in main ventilation system? What is the quantity of asbestos in the 5% of what total mined quantity of serpentine/serpentinite?</p> <p><i>The Air Quality and Greenhouse Gas Emissions Analysis Technical Report: Earthwork and Material Handling Fugitive Dust: Construction Activity Fugitive Dust Nov 2021 pp 300 of 1938</i> states that the Serpentine Content of Mine Fill will be 14.3% with an Asbestos content of serpentinite at 0.20%.</p> <p>The final total is 0.03% (<math>14.3\% \times 0.20\% = 2.86\% \div 100 = 0.03\%</math>) ???????</p> <p>HOW CAN THE MINE FILL BE 14.3% SERPENTINITE IF ONLY 1% OF MINED MATERIAL IS SERPENTINITE?</p>
	<p>ENFORCEMENT OF ROLLING INVENTORY ASBESTOS CONTENT</p>
Ind 634-32	<p>"If the three-month rolling Asbestos inventory for materials hoisted to the surface exceeds 0.01% asbestos by mass of PCM equivalent units the geology department will immediately investigate the source of the asbestos containing material and halt mining in the area of concern until a revised mine plan is prepared in compliance with the ASUR Plan (<i>ASUR Plan, document pp 20 or pp 22 of 131</i>)." </p> <p>Document page 9. ASUR Plan needs further interpretation/clarification:</p> <p>"If planned mining is projected to result in the Asbestos Inventory 3-month rolling average to exceed 0.01% by mass equivalent PCM units (1.07 TEM structures per nanogram)</p> <ul style="list-style-type: none"> <li>i. Gold mineralization (intended for processing) will <u>not</u> be mined</li> <li>ii. Barren rock from tunneling will either not be mined or mined using an auxiliary ventilation and dust collection system, as described in Section 6.1, designed to capture dust generated during the mining of these materials and prevent this dust from entering the main ventilation system and exhausting from the underground mine and a location for the underground disposal of this material will be specified and annotated on mine development plans." <p>SO, IF YOU ARE NOT GOING TO REMOVE THE GOLD MINERALIZATION, WHY WOULD YOU REMOVE THE BARREN ROCK SURROUNDING IT?</p> </li></ul>
Ind 634-33	<p>(<i>ASUR Plan, document pp 14 or pp 16 of 131</i>): "Records of all analytical testwork conducted will be retained for the life of the operation or a minimum of 7 years."</p> <p>Once in the environment, asbestos does not degrade and will continuously be released into ambient air by wind or any soil disturbance.</p> <p>Records must be kept on exposure monitoring for asbestos for at least 30 years, and worker medical surveillance records retained for the duration of employment plus 30 years (OSHA).</p> <p>Worker exposure occurs only during employment hours; however, community exposure occurs 24 hours per day. Workers choose to work in this environment with financial compensation. Workers are also provided training, respiratory protection, monitoring and health benefits while the community has none of these advantages.</p>





The life of the operation or 7 years of record retention is not an adequate retention period since disease caused by exposure may not manifest for 20 years-these are human lives at stake NOT TAX RECORDS!

**DUE TO IMPLICATIONS FROM LONG TERM EXPOSURE TO ASBESTOS, RECORDS OF ALL ANALYTICAL TESTWORK MUST BE RETAINED INDEFINITELY.**

(ASUR Plan, document pp 19 or 21 of 131): #10; If required by the NSAQMD, the plan must include an air monitoring component."

(ASUR Plan, document pp 20 or pp 22 of 131): "A geological report will be prepared annually with a summary of all materials mined. The report will include a summary of quantities of rock mined by lithology. The report will include analytical asbestos sampling data and all receipts issued for Engineered Fill. The report will include any dust sampling taken during operations. The report will include the results of any air monitoring or asbestos bulk sampling conducted at the request of NSAQMD."

Ind 634-34

A team of third-party licensed geologists should be monitoring and recording the above data every day to be utilized for reporting. The majority of this work is being performed underground...who will know the difference after the material is extracted, crushed and placed as engineered fill or hauled away?

BESIDES A REPORT, WHAT ACTIONS WILL BE TAKEN? ARE THERE ANY PENALTIES FOR EXCEEDENCES?

Is this plan legally enforceable? What if Rise obtains all the necessary permits to begin mining and decides to sell those permits to a third party or what if Rise sells the mine itself to a third party in the future...will the plan be required for the new operator?

Rise has stated that they will leave the infrastructure at the Brunswick site.

What assurances does the county have that the infrastructure will be clean and free from asbestos, heavy metals and silica contamination?

#### CONCLUSIONS:

The addition of the 3-month rolling inventory complicates downstream processes tremendously. It has the potential to affect air quality through increased fugitive dust emissions which increase the quantities of the TAGs (asbestos, silica and heavy metals) being released directly impacting the Health Risk Assessment results. The health of the community is at stake.

Ind 634-35

Asbestos emissions are now being calculated on the assumption that rock material will contain 0.01% asbestos as described by the ASUR Plan. However, the ASUR Plan cannot control the actual asbestos content in the material being mined, the plan can only try to control the distribution of material being used for engineered fill to a 0.01% asbestos content. The actual asbestos content of rock being mined is unknown and highly variable.

CAN YOU ASSUME THAT ALL MATERIAL (BARREN ROCK AND ORE ROCK) WILL BE ONLY 0.01% ASBESTOS WHEN CALCULATING EMISSIONS?

CLASSIFICATION AND QUANTIFICATION IS NOT POSSIBLE UNTIL AFTER TESTING BY TEM OCCURS, AND THAT INFORMATION MAY NOT BE KNOWN UNTIL TWO WEEKS AFTER EXTRACTION AND TRANSPORT TO THE SURFACE.

"The average asbestos content of the total mined material is of primary concern since asbestos does not have established acute noncancer effects (OEHHA 2020). Therefore, only the average asbestos emissions that could be generated over the long-term (per year), and associated long-term health risk, has been evaluated herein." (Air Quality and Greenhouse Gas Emissions Analysis Nov 2021, document pp 36) Rise now estimates these emissions at 0.01%.

This is the same logic regarding acute vs long term exposure for the community. "Asbestos is classified as a known human carcinogen by the US state, federal, and international agencies, as well as by the World Health Organization" (Walker). There is no safe level of asbestos exposure (WHO).

ANY asbestos released to the ambient environment regardless of an immediate quantity released has the potential for long term implications because asbestos does not readily degrade once in the environment. "It is one of the most pervasive environmental hazards in the world. (Walker) "We know very little about the rates of weathering and leaching of asbestos in soil environments, but the available information suggests that substantial reductions in the amount of chrysotile may take hundreds or thousands of years, depending on the soil environment, and somewhat longer for amphibole asbestos." (GUIDELINES FOR GEOLOGIC INVESTIGATIONS OF NATURALLY OCCURRING ASBESTOS IN CALIFORNIA, Special Publication 124, 2002 pp 24)



Thank you,



Pam Heard RRT

Registered Respiratory Therapist (RRT)  
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Grass Valley CA 95945  
psheard@yahoo.com



Mar 25, 2022

To: Matt Kelley, Senior Planner

Nevada County Planning Department  
950 Maidu Ave, Suite 170  
Nevada City, CA  
530-265-1423  
Matt.Kelley@co.nevada.ca.us  
Idaho.MMEIR@co.nevada.ca.us

Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR.

HEALTH RISK ASSESSMENT CRITIQUE:

Community Health Risks from Exposure to Toxic Air Contaminants

"As explained in Section 2.1.2.2, Non-Criteria Air Pollutants, of the AQ-GHG Technical Report, a TAC is an air pollutant, identified in regulation by CARB, which may cause or contribute to an increase in deaths or serious illness, or which may pose a present or potential hazard to human health...Health effects to TACs may occur at extremely low levels and it is typically difficult to identify levels of exposure which do not produce adverse health effects." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B Memorandum, Subject: Idaho-Maryland Mine-Health Effects from Criteria Air Pollutants, pg 10, 2021*)

"A dispersion modeling analysis was conducted for DPM emitted from diesel vehicles and off-road equipment, blasting emissions, as well as for TACs from fugitive dust sources on the proposed project site for the HRA to assess the health risk impacts of the project's construction and operation on proximate off-site sensitive receptors." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 8, 2021*) "The cancer risk calculations were performed by multiplying the predicted dispersion modeled output data by the TAC emissions and the appropriate risk values...The noncancer health impact of an inhaled TAC is measured by the hazard quotient, which is the ratio of the ambient concentration of a TAC in units of  $\mu\text{g}/\text{m}^3$  divided by the reference exposure level (REL), also in units of  $\mu\text{g}/\text{m}^3$ ." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 4, 2021*)

"For evaluating health risk, the HRA was based on the assumption that exposure from construction and operational TAC emissions would generally occur up to 20 hours per day, 7 days per week for construction and up to 24 hours per day, 7 days per week, for 30 years for operation. This is consistent with OEHHA's guidance for performing operational HRAs.<sup>1</sup>" (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 1, 2021*)

The Idaho-Maryland Mine Project permit is for 80 years, almost three times the 30 years of exposure used in the health risk assessment.

WHAT WILL BE THE IMPACT ON HEALTH AFTER THOSE 30 YEARS OF EXPOSURE AND BEYOND?

Ind 634-36



This critique will examine input data points used in the AERMOD dispersion model whose output data then predicts the health risk impacts to the community from exposure to toxic air contaminants.

#### AERMOD MODEL

Regarding the selected dispersion model and its inputs is the statement -"Principal parameters of AERMOD for the project operations included the following:

- Dispersion Model
- Meteorological Data
- Urban and Rural Options
- Terrain Characteristics
- Sensitive Receptors
- Source Release Scenario
- Buildings" (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pp 8-12, 2021*)

Several of these principal parameters require additional scrutiny with regards to the actual inputs used in the model and their applicability to the Grass Valley community in terms of future health risks.

Ind 634-37

Air pollutant dispersal is dependent on several factors: wind speed, wind direction, atmospheric stability and topography. (Transport and Dispersion of Air Pollution, Chapter 3, [www.3epa.gov](http://www.3epa.gov))

Atmospheric stability is dependent on the forces that relate to the vertical movement of air such as air density, air pressure, temperature and relative humidity. These forces dynamically interact on a constant basis to affect turbulence and the subsequent dispersal patterns of pollutants. It becomes critical to obtain the most accurate meteorological data available for input into these models which then estimate the health risks for cancer along with acute and long-term illness from exposures.

#### METEOROLOGICAL DATA

From the EPA Support Center for Regulatory Atmospheric Modeling (SCRAM) Air Modeling-Observational Meteorological Data: "Observed meteorological data for use in air quality modeling consist of physical parameters that are measured directly by instrumentation and include temperature, dew point, wind direction, wind speed, cloud cover, cloud layer(s), ceiling height, visibility, current weather, and precipitation amounts. These data are used in air quality models to capture the atmospheric conditions occurring at a source and/or receptor location, and therefore, play an important role as they effect the concentration of pollutants at receptors of interest." ([www.epa.gov/scram/air-modeling-observational-meteorological-data](http://www.epa.gov/scram/air-modeling-observational-meteorological-data), retrieved 1.27.2022)

The HRA states: "The nearest stations with processed meteorological data for use in AERMOD are Blue Canyon (17 miles away), Auburn (18 miles away) and Beale (22 miles away). The predominant wind direction at the project site is from the North-East and South-West direction (Meteoblue 2020). The Blue Canyon met station has a predominant wind direction from the North-East and South; the Auburn met station from the East; and the Beale station from the South-East and North-West (CARB 2020)." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 12*)

"Blue Canyon was selected since it is the closest station and is the most representative of the project site." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk*





Assessment, Appendix B, pg 12, 2021) There are multiple reasons why Blue Canyon is NOT representative of the project site in terms of meteorological conditions.

Blue Canyon is in the Sierra Nevada Mountains at an elevation of 4695 ft. This elevation creates a very different climate and weather patterns than what Grass Valley experiences in the foothills at an elevation of 2411 ft. Simply changing the terrain elevation data input does NOT correct for the differences in air density, air pressure, solar heating and dry/wet adiabatic lapse rates that result from the significant disparities between Grass Valley and Blue Canyon meteorological conditions.

The website, Meteoblue states: "Climate Grass Valley 39.22°N 121.06°W The meteoblue climate diagrams are based on 30 years of hourly weather model simulations and available for every place on Earth. They give good indications of typical climate patterns and expected conditions (temperature, precipitation, sunshine and wind). The simulated weather data have a spatial resolution of approximately 30 km and may not reproduce all local weather effects, such as thunderstorms, local winds, or tornados." (Meteoblue. 2020. Climate Grass Valley. (Accessed September 2020. [https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/grass-valley\\_united-states-of-america\\_5353775](https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/grass-valley_united-states-of-america_5353775).)

NOTE: 30 km=18.641 miles The Meteoblue site is not specific to Grass Valley with a spatial resolution of 30 km. A comparison of downloads in Meteoblue from both locations, Blue Canyon and Grass Valley, shows identical graphic measurements for ALL parameters:

- Average temperatures and precipitation
- Cloudy, sunny and precipitation days
- Maximum temperatures
- Precipitation amounts
- Wind speed
- Wind rose

Because of the 30 km resolution, Meteoblue makes zero distinction between Grass Valley and Blue Canyon weather patterns.

In the Air Quality Report, the consultant utilizes multiple quotes from various county documents, agencies and websites to substantiate his climate and weather claims. For the sake of argument, this critique uses data downloaded from WeatherSpark.com to compare Grass Valley to Blue Canyon meteorology. This website uses the same databases to compare the two locations.

The data for Grass Valley CA is based on a statistical analysis of historical hourly weather reports and model reconstructions from January 1, 1980 to December 31, 2016 (36 years total). The stations contributing to this reconstruction are: Nevada County Air Park (/y/149703/Average-Weather-at-Nevada-County-Air-Park-California-United-States-Year-Round) (67%, 5.0 kilometers, east); Auburn Municipal Airport (/y/145263/Average-Weather-at-Auburn-Municipal-Airport-California-United-States-Year-Round) (24%, 29 kilometers, south); and Beale Air Force Base (/y/145271/Average-Weather-at-Beale-Air-Force-Base-California-United-States-Year-Round) (9%, 33 kilometers, west).

The WeatherSpark data source for Blue Canyon illustrates the typical weather at Blue Canyon-Nyack Airport, based on a statistical analysis of historical hourly weather reports and model reconstructions from January 1, 1980 to December 31, 2016.





OTHER DATABASE COMMONALITIES FOR WEATHERSPARK

All data relating to the Sun's position (e.g., sunrise and sunset) are computed using astronomical formulas from the book, *Astronomical Algorithms* 2nd Edition (<https://www.amazon.com/Astronomical-Algorithms-Jean-Meeus/dp/0943396611>), by Jean Meeus.

All other weather data, including cloud cover, precipitation, wind speed and direction, and solar flux, come from NASA's MERRA-2 Modern-Era Retrospective Analysis. This reanalysis combines a variety of wide-area measurements in a state-of-the-art global meteorological model to reconstruct the hourly history of weather throughout the world on a 50-kilometer grid.

Land Use data comes from the Global Land Cover SHARE database, published by the Food and Agriculture Organization of the United Nations.

Elevation data comes from the Shuttle Radar Topography Mission (SRTM), published by NASA's Jet Propulsion Laboratory.

Names, locations, and time zones of places and some airports come from the GeoNames Geographical Database.

Time zones for airports and weather stations are provided by AskGeo.com.

Maps are © Esri, with data from National Geographic, Esri, DeLorme, NAVTEQ, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, and IPC

**THE NEVADA COUNTY AIR PARK REFERENCED AS THE WEATHERSPARK SOURCE IS 4000 FEET NE OF THE BRUNSWICK SITE AS THE CROW FLIES.**

GRASS VALLEY

There is an average 10°F higher temperature differential every month of the year in Grass Valley. This conclusion has been verified on WeatherSpark and the Western Regional Climate Center databases. For example, the hot season lasts for 3.1 months in Grass Valley, from June 15 to September 18, with an average daily high temperature above 81° F. In Blue Canyon there is no hot season. The warm season there lasts for 2.9 months, from June 20 to September 18, with an average daily high temperature above 72°F. Average hourly temperatures also vary dramatically between the two locations.

Regarding precipitation: annually Grass Valley receives 53.2 inches rainfall vs 67.5 in Blue Canyon; and annually Grass Valley receives 8.4 inches snowfall vs 240.40 inches snowfall in Blue Canyon.

Wind directions also display wide variances between the two locations. This section discusses the wide-area hourly average wind vector (speed and direction) at 10 meters above the ground. The wind experienced at any given location is highly dependent on local topography and other factors, and instantaneous wind speed and direction vary more widely than hourly averages.

The average hourly wind speed in Grass Valley does not vary significantly over the course of the year, remaining within 0.5 miles per hour of 5.7 miles per hour throughout.

The predominant average hourly wind direction in Grass Valley varies throughout the year. The wind is most often from the south for 7.4 months, from February 10 to September 21, with a peak percentage of 55% on August 11. The wind is most often from the east for 4.6 months, from September 21 to February 10, with a peak percentage



of 49% on January 1. (<https://weatherspark.com/y/1178/Average-Weather-in-Grass-Valley-California-United-States-Year-Round>)

#### BLUE CANYON

In Blue Canyon, the average hourly wind speed at Blue Canyon-Nyack Airport experiences *mild* seasonal variation over the course of the year.

The *windier* part of the year lasts for 4.3 months, from November 19 to March 30, with average wind speeds of more than 5.2 miles per hour. The *windiest* month of the year at Blue Canyon-Nyack Airport is December, with an average hourly wind speed of 5.7 miles per hour.

The *calmer* time of year lasts for 7.7 months, from March 30 to November 19. The *calmest* month of the year at Blue Canyon-Nyack Airport is May, with an average hourly wind speed of 4.8 miles per hour.

The wind is most often from the south for 3.7 months, from January 31 to May 21; for 3.4 weeks, from August 18 to September 11; and for 1.1 months, from November 3 to December 7, with a peak percentage of 48% on March 2. The wind is most often from the west for 2.9 months, from May 21 to August 18, with a peak percentage of 41% on July 18. The wind is most often from the east for 1.7 months, from September 11 to November 3 and for 1.8 months, from December 7 to January 31, with a peak percentage of 41% on October 20.

([weatherspark.com/y/145297/Average-Weather-at-Blue-Canyon-Nyack-Airport-California-United-States-Year-Round#](https://weatherspark.com/y/145297/Average-Weather-at-Blue-Canyon-Nyack-Airport-California-United-States-Year-Round#))

The Brunswick Industrial site is located just southeast of Grass Valley. This means that the winds will transport all pollutants to the north and west toward the Brunswick Basin and downtown.

It is interesting to note that in Blue Canyon, the wind is blowing east during the hottest part of the year, May 21 to August 18. This input into AERMOD would not correlate with Grass Valley wind data under any circumstances.

These differences in weather variables must be taken into account during HRA modeling since the project will be located in Grass Valley not in Blue Canyon. Using Blue Canyon meteorological data is NOT representative of Grass Valley.

The meteorological input data, AERMET, is designed to accept data from any of the following sources: 1) standard hourly National Weather Service (NWS) data from the most representative site; 2) morning soundings of winds, temperature, and dew point from the nearest upper air station; and 3) on-site wind, temperature, turbulence, pressure and radiation measurements. AERMET can process commercially available or custom on-site meteorological data. ([www.weblakes.com/guides/aermod/section8/8\\_1](http://www.weblakes.com/guides/aermod/section8/8_1))

SHOULDN'T METEOROLOGICAL DATA MORE REPRESENTATIVE OF GRASS VALLEY BE USED FOR THE HEALTH RISK ASSESSMENT?

Ind 634-38

#### WINDBORNE PARTICULATE MATTER

The following tables are based on Stoke's Law for Fluid Particle Forces and EPA Inhalable Dust definitions and calculations:



Table 1: 10-micron particle

Wind Speed (mph)	Distance Traveled (miles)
3.1	0.55
6.2	1.1
12.4	2.3
24.8	4.6
37.3	6.9
49.7	9.2

Table 2: 5-micron particle

Wind Speed (mph)	Distance Traveled (miles)
3.1	2.2
6.2	4.5
12.4	9
24.8	18
37.3	27
49.7	36.1

(<http://toxsci.oxfordjournals.org/content/65/1/7.full> (including impacts/effects of airborne sulfur (SO2) and silica particulates/particles)

The average wind speed in Grass Valley is 5.7 mph. The Brunswick Site is located 2 miles from downtown Grass Valley. As evidenced above, the smaller the particle, the greater the distance travelled. Grass Valley currently monitors PM 2.5 at the Litton Building. Nevada County is currently classified as nonattainment status for PM10.

The International Agency for Research on Cancer of the World Health Organization has classified PM2.5 as a human carcinogen (IARC: *Outdoor Air Pollution a Leading Environmental Cause of Cancer Deaths; Technical Report; International Agency for Research on Cancer (IARC): Lyon, French, 27 2013*)

On September 22, 2021 the World Health Organization revised air quality guidelines decreasing criteria air pollutants, especially the recommended exposure levels for PM10 and PM2.5. (<https://www.who.int/news-room/fact-sheets/question/what-are-the-new-air-quality-guidelines>)

Has a baseline scenario for Grass Valley PM2.5 emissions or PM10 emissions been created since Nevada County is in nonattainment status for PM10? Were background PM2.5 concentrations from long range sources added to the HRA model?

A baseline concentration must be established in order to measure the TRUE impact from the addition of this project to existing air quality and the cumulative impacts on community health.

DPM, silica and asbestos fugitive dust will be emitted under two different categories: criteria air pollutants and as Toxic Air Contaminants. Yet in each situation, their health impacts to the community will be minimized.

As a criteria air pollutant, emission levels are not related to the immediate geographical area: "Notably, as detailed in Appendix C, there are numerous scientific and technological complexities associated with correlating criteria air pollutant emissions from an individual project to specific health effects or potential additional nonattainment days, such as the disconnect between mass emissions and concentrations due to secondary pollutant (such as O3) generation and pollutant transport, as well as the inaccuracy of applying regional and population-wide models to a local level in order to estimate health effects, and there are currently no modeling tools endorsed by an expert agency (i.e. NSAMQD) that could provide reliable and meaningful additional information regarding health effects from criteria air pollutant generated by individual projects." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project, pg 46, 2021*)

As a toxic air contaminant, asbestos and respirable crystalline silica will fall under the non-criteria air pollutant category. There are no established limits for monitoring emissions of non-criteria pollutants into the ambient

Ind 634-39





- Ind 634-40** **environment.** The HRA is based on 30 years of exposure, thus the cumulative effects of the 80-year permit are not addressed.
- Ind 634-41** HOW WILL THE RELEASE OF THESE TOXIC MICROSCOPIC PARTICULATES TO THE AMBIENT ENVIROMENT BE MONITORED?
- Ind 634-42** SENSITIVE RECEPTORS
- When listing *Receptors Used for Evaluating Modeled Impacts* are the following statements: "There are existing residences in all directions of the project site, with the nearest located north of East Bennett Road at approximately 100 feet from the project boundary. The nearest hospitals and schools to the project sites are the Sierra Nevada Memorial Hospital on Glasson Way (approximately 1800 feet north of the Centennial Industrial Site) and the Montessori House of Children on The Burma Road (approximately 2,500 feet south of the Brunswick Industrial Site boundary). However, residential receptors are the most conservative to evaluate as discussed further in Section 4.3." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 7, 2021*)
- What about the impacts to the following receptors?
- The Durham School Bus Depot is located 1.74 Miles west of the Brunswick Industrial Site on Bennett Road. These buses transport our children throughout the county. Will we be delivering asbestos and silica dust along with the children?
- Within a 2-mile arc north of the Brunswick Industrial Site are 5 Skilled Nursing Facilities (Golden Empire, Wolf Creek, Atria Memory Care, Spring Hill Manor, and Crystal Ridge), at least 6 Assisted Living Facilities, 10 low-income housing apartment complexes, Hospitality House and Brunswick Commons housing for the homeless. All supportive services are located here as well; Pride Industries, FREED, Alta Regional Center, DaVita Dialysis, Nevada County Public Health offices and Connecting Point. Chapa-De Indian Health and multiple physicians' offices serving Medi-Cal patients are located here too.
- Ind 634-43** According to the 2020 US census, 28.6% of Nevada County is 65 years or older as compared to the statewide rate of 14.3% for that population. Under age 65, the disability rate is 14.4% and 32.4% of the population have Medicaid coverage. The mortality rate from Chronic Lung Disease is double the state wide rates (69.26 deaths/100,000 people vs 34.92/100,000). There are also elevated rates for Heart Disease Mortality, Hypertension Mortality, Stroke Mortality and All-Cause Cancer Mortality vs state wide rates.
- The demographics of our community must be considered in the context of this project. We already have elevated baselines for high levels of the criteria air pollutants ozone and particulate matter, radon, aging population, chronic disease, and poverty.
- WILL THE COUNTY'S EXISTING BASELINES BE TAKEN INTO ACCOUNT?
- Ind 634-44** SOURCE RELEASE SCENARIO
- Table 2. Emission Source Parameters
- DIESEL FUEL
- These parameters are used to input data into the AERMOD dispersion model. On Page 10 of the HRA, the generators are listed at a Base Elevation of 2,748.39 m. This calculates to a height of 9017 feet. The Brunswick



Ind 634-45

Diesel Storage Tank is listed at a Base Elevation of 2,757.74 m which equals a height of 9048 feet and the Centennial Diesel Storage Tank is listed with a Base Elevation of 2,491.44 m which equals 8174 feet. These measurements are used to estimate carcinogenic volatile organic compound emissions from breathing and working losses from storage tanks which include benzene, hexane, toluene and 2,2,4-trimethylpentane. *Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, Pg 23, 2021*

All data entry inputs should be verified in AERMOD model due to these errors, especially units of measure, which may be affected for other source parameters (i.e. plume height/plume width of 25/25 meters for line sources).

Diesel fuel combustion from generator use will exhaust gases and DPM. These estimated emissions have been included for only 100 hours per year during testing/maintenance. Any emissions from actual use have been categorized as speculative. During a Public Safety Power Shutoff (PSPS), it is anticipated that 15,000 gallons of diesel fuel combustion per day will be required to maintain mining operations.

Will diesel fuel consumption be monitored? Will there be any provisions to mitigate the impacts from PSPS generator use contributing to increased criteria air pollutants, GHGs and DPM emissions affecting the community and environment?

Will there be any penalties if Tier 4 Final engines are not used exclusively due to "commercially available" status exemptions?

FUGITIVE DUST

SILICA

Silica will be released from on-road vehicles, underground blasting and crushing, ore processing along with earthwork and material handling.

All of the consultants have stated in their reports that they are using information provided by Rise to generate their conclusions. A prime example is the silica emissions. The following table shows the anticipated rock types and amounts expected to be mined:

Ind 634-46

Rock Type	Percent of Total
Meta-Andesite	96%
Altered Meta-Andesite	2%
Diabase	1%
Serpentinite	1%

This chart represents the anticipated barren rock ratios to be mined, approximately 500 tons per day. It does not account for the 1000 tons of mineralized ore rock to be mined each day. (*Groundwater Hydrology and Water Quality Analysis, EMKO, pg 93*)

"The applicant estimates that the ore processed would be quartz veins hosted primarily within andesite rock and an assumed 60% silica content." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 35, 2021*)





Regarding rock composition, this is meta-andesite rock not just andesite...it has undergone metamorphosis becoming altered in composition. Johnston (1940) stated: "The degree of metamorphism may vary in this unit, such that parts of it have been referred to as amphibolite schist, porphyrite, diabase, and quartz porphyrite." (*The Gold Quartz Veins of Grass Valley, referenced in Groundwater Hydrology and Water Quality Analysis EMKO pg 9*)

The laboratory that Rise used for all metals analyses, ACZ Laboratories, is certified to perform both silica and silicon dioxide tests yet not a single sample was analyzed for this parameter. (*ACZ Analytical Capabilities 2017*).

The engineering firm, NV5, stated in the *Centennial Geotechnical Report* (pg 12) that: "We understand that the sand tailings will likely have a gradation similar to the historical gradation presented in the table below, and will typically have a large proportion of quartz."

Mesh Size	Particle Size (mm)	Particle Size (micron)	Percent Passing	Description
48	0.300	300	97.7	Medium Sand
65	0.212	212	87.5	Fine Sand
100	0.150	150	63.9	Fine Sand
200	0.075	75	32.3	Silt
325	0.044	44	12.1	Silt

Quartz is 100% silicon dioxide AND "1000 tons of ore" rock will be processed into tailings each and every day, *Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix, B pg 21, 2021*).

These tailings will contain respirable crystalline silica, a toxic air contaminant. Rise has assumed that the ore rock is 98% andesite with a silica content of 60%. There is no data to substantiate this assumption. Minimizing the levels of this TAC to be generated from the excavation of material and milling of quartz greatly diminishes its' impact in the HRA considering the vast amounts, 1500 tons of barren and ore rock, to be mined each day.

HOW WILL THE COMMUNITY PROTECT ITSELF FROM UNKNOWN QUANTITIES OF SILICA?

ASBESTOS

Asbestos will be released from on-road vehicles, during underground blasting and crushing, ore processing and along with earthwork and material handling.

The rock composition chart above lists total serpentinite mined at 1% yet the *Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Earthwork and Material Handling Fugitive Dust: Construction Activity Fugitive Dust* assumes *Serpentinite Content of Mine Fill* at 14.3%. Based on the given information, daily mine fill content is composed of 500 tons of tailings and 500 tons of barren rock at 1% serpentinite.

With these ratios, how can engineered fill contain 14.3% serpentinite?

Rise has developed an Asbestos, Serpentinite and Ultramafic Rock management plan with the goal of minimizing asbestos release. A 90-day rolling inventory will be maintained in an effort to prevent asbestos contaminated material from being used as aggregate and engineered fill. A three-grab composite sample will be obtained for every 1000 tons mined. The sampling point is located mid drop in the silo. Inventory material will then be screened using Polarized Light Microscopy (PLM), followed by Transmission Electron Microscopy (TEM) testing with results to be mathematically converted to Phase Contrast Microscopy (PCM) equivalent units. These tests are not comparable since they utilize different preparatory methods, sample amounts and microscopy techniques. The detection limit for PLM testing is 0.25% and the detection limit for TEM testing is 0.001%. Conversion of TEM to PCM equivalent units yields a detection limit of 0.01%.

Ind 634-47

Ind 634-48



Under this plan, Rise is using the PCM equivalent units limit of 0.01% to calculate emissions levels for fugitive dust. "A conservative approach for the modelling of TAC emissions is used, with the asbestos content in mined materials assumed at the maximum of 0.01% by mass of PCM equivalent units. The average asbestos content of the mined material is of primary concern since asbestos does not have established acute noncancer effects (OEHHA)" (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 22, 2021*).

Initial asbestos sampling of 42 samples (*Asbestos Sampling Memo June 2020*) resulted in two samples at 0.075% and 2.5% by PLM analysis along with two samples at 2.0% and 3.1% by TEM analysis. The remaining 38 samples were non-detect (<0.25%) by PLM. Re-testing of these PLM samples by TEM yielded 6 samples with results greater than the PCM equivalent units detection limit of 0.01% in addition to the original 2 TEM samples that were not re-tested. Thus, **twenty percent** of the samples had asbestos levels greater than 0.01% PCM equivalent units.

Excluding the two grab tailings samples from Centennial and the two blanks, the average overall length of a sample core tested for asbestos was 5.34 inches. Samples were from 6 of 19 (32%) of total cores drilled by Rise: 9 samples from I-18-11, 1 sample from I-18-12, 9 samples from I-19-13, 7 samples from I-19-13A, 8 samples from I-19-14 and 4 samples from I-19-14A. Drilling was stopped when asbestos was detected. Drill logs are not available, no information available as to quantity, location, depth, etc. These cores appear to be in close proximity to each other as viewed on geological maps (*Asbestos Sampling Memo June 2020 pp 11-13*).

DEIR pg 3-20: "The ASUR plan incorporates routine asbestos testing by Transmission Electron Microscopy (TEM) and an Asbestos Inventory to ensure that average mined material and engineered fill contains less than 0.01% asbestos by mass of Phase Contrast Microscopy (PCM) equivalent units."

Just because Rise believes that they will be able to control the distribution of material to 0.01% asbestos content does NOT mean that they can control the amount of asbestos in the actual mined material. The content of asbestos in the serpentinite is unknown until tested-this requires blasting, excavation, crushing, skipping, conveyance to the surface, deposition and storage to then be followed by testing. Ventilation from the mine during these underground processes will emit asbestos to the ambient environment. This quantity of asbestos emissions is unknown and CANNOT be assumed to be only 0.01%.

**Ind 634-49** The ASUR Plan dictates the use of water curtains and an auxiliary fan system when mining serpentinite material. According to Rise, this system uses MERV 16 filters that will trap particles to 0.03 microns reducing asbestos fibers by 95% before the fibers enter the main ventilation system. How much asbestos will be in the remaining 5% if the initial asbestos content of the rock is unknown along with the unknown quantities of rock mined?

Maintenance of the 0.01% inventory will not be attemptable until AFTER the material is mined, brought to the surface and tested twice- requiring up to two weeks before the results are known.

These asbestos emissions are not accounted for in fugitive dust estimations.

**Ind 634-50** In 1986, asbestos was identified by the Board (CARB) as a toxic air contaminant: the Board also determined that there is not enough scientific evidence to identify an asbestos threshold level below which no significant adverse health effects are anticipated (17 CCR 93000). (*Implementation Guidance Document 2017, CARB pg 1*)

The World Health Organization (WHO) concurs that there is no safe level of asbestos exposure. Any asbestos released to the ambient environment will create chronic exposure risk for the community since asbestos does not readily degrade. Protecting mine workers from acute exposure when mining material "rich in asbestos" does not equate to the same level of community protection. Under these circumstances, miners will work a short-shift, wear respirators, be monitored for exposure, and decontaminate themselves before going home. They have the freedom of choice to work in that environment, financial compensation, training in exposure control and health care benefits. The community has none of these protections.

By using the detection level of 0.01% mass by PCM equivalent units to calculate emissions used in the HRA, the levels of this TAC have been grossly underestimated.





↑ HOW WILL THE COMMUNITY PROTECT ITSELF FROM UNKNOWN QUANTITIES OF ASBESTOS?

HEAVY METALS

"Blasting and crushing would also result in emissions of dust with trace heavy metals TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium. Concentrations of each heavy metal within the barren rock and mineralized rock was taken from Table 4-7 of the *Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project* (EMKO Environmental, Inc. 2020)"

Heavy metals will be released: from off-road equipment, on-road vehicles, during underground blasting and crushing, ore processing along with earthwork and material handling-all phases of operations.

The data used for heavy metal toxic air contaminants in the Health Risk Assessment are all notated by the laboratory as being received and tested beyond the EPA recommended hold times of 28 days for mercury and 6 months for all remaining metals. Exploratory drilling began in 2017. Since the drill logs are unavailable, the exact sample dates for each core are unknown, but all samples were submitted and received by the gold assay laboratory on February 20, 2019. (*Appendices: Groundwater Hydrology and Water Quality Analysis EMKO, pp 515-516*) and (*Appendices: Groundwater, Hydrology and Water Quality Analysis Report: Inorganic Extended Qualifier Reports pp. 389-407 and 458-484*)

Ind 634-51

After assays were performed, samples were then submitted to ACZ Laboratories for metal analyses. It is not clear where the samples were located between the assay lab, ALS Laboratories in Reno, Nevada and submission to ACZ Laboratories in Steamboat Springs, Colorado. The Chain of Custodies describe these 47 samples as Tailings (assay pulp). All list a sample date of 3/5/19:12:00 pm. Under the Sampler's Name were the initials, BM (Ben Mossman?) Ben Mossman and Andrew Kopania of EMKO both received copies of the laboratory reports as listed on the CoCs. The laboratory received by date for all samples is 11.11.2019. Twenty samples were digested on 11.22.2019 and the remaining twenty-seven samples were digested on 11.26.2019. (The digestion dates would be used for endpoint hold time calculations).

These samples may have been collected at that time but they were NOT sampled at that time. These metals analyses were performed in November 2019 in two batches. This means that all samples were tested at least 9 months beyond their hold time expiration date, probably more.

Potentially toxic elements (PTEs) hosted in asbestos elongate mineral particles is one of the factors that determines their toxic/pathogenic effects. Metals such as Fe, Mn, Cr, and Be are known to induce toxicity and contribute to asbestos related diseases. "...it is essential to quantify the toxic elements present in asbestos elongate mineral particles in order to prevent asbestos-related diseases."  
(<https://doi.org/10.1016/j.chemgeo.2020.119896>Get rights and content)

SHOULDN'T VALID DATA BE USED WHEN EVALUATING THE HEALTH RISKS TO THE COMMUNITY FROM THESE TOXIC AIR CONTAMINANTS, ESPECIALLY WHEN THESE METALS HAVE THE ABILITY TO POTENTIATE THE EFFECTS OF ASBESTOS?

CONCLUSION

Ind 634-52

"Based on the PM10 emissions estimated, emissions of asbestos, silica, and heavy metals were estimated for the purposes of this HRA." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, Pg 22*)

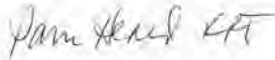


↑  
Estimations of estimates...estimates of estimations

IS THERE ANY VALIDITY IN ANY OF THESE ASSUMPTIONS, ESTIMATIONS OR DATA REGARDING THE EMISSIONS OF SILICA, ASBESTOS, HEAVY METALS OR DPM?

IS THERE ANY VALIDITY TO THIS HEALTH RISK ASSESSMENT OF OUR COMMUNITY?

Thank you,



Pam Heard RRT

Registered Respiratory Therapist (RRT)  
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Mar 25, 2022

To: Matt Kelley, Senior Planner

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950 Maidu Ave, Suite 170  
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530-265-1423  
Matt.Kelley@co.nevada.ca.us  
Idaho.MMEIR@co.nevada.ca.us

Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR. as an Addendum to my Health Risk Assessment Critique.

#### Health Risk Assessment Critique Addendum

##### ANFO EXPLOSIVES

Other emissions of TACs from blasting pertain to the detonation of ANFO, which were estimated based on emission factors from *AB 2588 Combustion Emission Factors* (Ventura County Air Pollution Control District 2001). (*Air Quality and Greenhouse Gas Emissions for the Idaho-Maryland Mine Project, 2021 Pg 36*)

**Ind 634-53**

These TACs are listed found in Underground Blasting and Crushing in Table 10. Project Annual On-Site Operational TAC Emissions (*Air Quality and Greenhouse Gas Emissions for the Idaho-Maryland Mine Project, 2021 Appendix B, Health Risk Assessment, pg 386*)

Explosive use is estimated at 0.93 tons per day. ANFO contains ~6 % diesel fuel #2. Rise also plans to use emulsion-based explosives and the emissions for emulsion-based explosives are currently unknown.

The diesel fuel in ANFO will release TACs upon combustion and include: acetaldehyde, acrolein, benzene, 1,3 butadiene, formaldehyde, naphthalene, polycyclic aromatic hydrocarbons (PAHs) and toluene, etc.

However, in Table 10, these compounds are only estimated for Underground Blasting and not for the diesel fuel used in Off-Road Equipment, On-Road Vehicles, and Diesel Generators. Only DPM emissions have been included for Off-Road Equipment, On-Road Vehicles and Diesel Generators.

HAVE ALL OF THE TACs FROM DIESEL FUEL COMBUSTION BEEN INCLUDED BEYOND JUST THE DPM EMISSIONS?

##### HEXAVALENT CHROMIUM

**Ind 634-54**

##### EXPLOSIVES

Hexavalent chromium is also found in the detonation of explosives. It is released from the combustion of diesel fuel and is also often used as a catalyst in ANFO composition. An estimate for the hexavalent chromium from underground blasting was included in Table 10. Project Annual On-Site Operational TAC Emissions (*Air Quality and Greenhouse Gas Emissions for the Idaho-Maryland Mine Project, 2021 Appendix B, Health Risk Assessment*)





PORTLAND CEMENT (This topic is more germane to groundwater contamination but there will be some airborne exposures from delivery, mixing, etc.)

Hexavalent chromium is toxic air contaminant found in Portland cement in varying ratios. The Cemented Paste Backfill study investigated the paste process with the conclusions that more work must be done regarding:

- Identify a cement supplier to provide cement with low hexavalent chromium content
- Perform leachate analysis to ensure minimal leaching of hexavalent chromium in CPB
- Experiment with CPB rheology to determine proper ratios of cement, fill, etc.

Regarding hexavalent chromium content of cement: "Itasca (2020a) recommends that additional testing and engineering be conducted prior to implementation to select the proper source for the Portland Cement Binding agent to minimize the presence of Cr<sup>6</sup> in the mixture, and identify the minimum time that should be allowed for the mixture to cure before allowing it to become inundated in the mine workings." (*Groundwater Hydrology and Water Analysis for the Idaho-Maryland Mine Project EMKO pg 103*)

**Ind 634-55**

"Prior to use of CPB, additional documentation would be needed to verify that Cr<sup>6</sup> levels in the Portland cement used for the mixture are minimal and will not leach." "The Conditional Use Permit, either as a mitigation measure or as a condition of approval, should require that the source of the Portland cement to be used for the CPB be specified and that testing data showing the Cr<sup>6</sup> levels do not leach above the water quality standards must be provided to the County prior to the use of CPB. In addition, the County should require that a RoQWD for use of CPB be submitted to RWQCB at least six months prior to the proposed initial use of CPB and that the WDR be received prior to initiating any mine backfilling using CPB." (*Groundwater Hydrology and Water Analysis for the Idaho-Maryland Mine Project EMKO pg 115*)

"The presence of chromium in cement has been identified as a potential water-quality concern related to the use of CPB. Hexavalent chromium (Cr[VI]) is an oxidized form of chromium that is more soluble and mobile in the environment than reduced forms of chromium. Notably, less Cr (VI) leaches from cured cement than from unhydrated cement; Estokova et al. (2018) demonstrated that less than 0.5 of total chromium leached from a range of cured cement composites compared to 0.8% to 1.8% of total chromium from the Portland cement binder itself. Thus, selecting a supplier with low Cr (VI) content cement and ensuring the CPB is not inundated before it sets can minimize the potential for issues with Cr (VI) leaching." (*Cemented Paste Backfill Study, pg 3*)

"Itasca understands that Rise plans to complete more extensive strength, rheological, and geochemical testing on their ultimate CPB mixture at a later stage in the IMM project." (*Cemented Paste Backfill Study pg 6*)

There is no evidence that any of this work has been completed.

**Ind 634-56**

What type of ventilation will be used in the cement processing plant?

**Ind 634-57**

HOW CAN YOU ESTIMATE THE AMOUNT OF HEXAVALENT CHROMIUM WHEN YOU DO NOT KNOW THE AMOUNT OF CEMENT TO BE USED, DO NOT HAVE A SUPPLIER OR KNOW THE COMPOSITION OF THE CEMENT REGARDING HEXAVALENT CHROMIUM AND SILICA CONTENT?

RADON

**Ind 634-58**

Radon is a toxic air contaminant that needs more consideration regarding community impacts. There are only two mentions of radon throughout all the consultants' reports. In the NV5 reports are the disclaimer sentences: "Our scope of services did not include a groundwater flow analysis nor an evaluation of the Site for the presence of hazardous materials, mold or radon gas." (*Geotechnical Engineering Report Idaho-Maryland Mine Project-Centennial Industrial Site, pg 2*) and "Our scope of services did not include a groundwater flow analysis nor an



evaluation of the Site for the presence of hazardous materials, historic mining features, asbestiform materials, mold or radon gas." (*Geotechnical Engineering Report Idaho-Maryland Mine Project-Brunswick Industrial Site, pg 2*)

- According to the world Health Organization (WHO), "Radon is a radioactive gas that emanates from rocks and soil and tends to concentrate in enclosed spaces like underground mines and homes".
- It is generated from the decay of radium. Radium is a decay product of uranium and thorium which are naturally occurring in rocks and soils.
- Because it is a gas, it moves freely in the air spaces between rocks and in soils.
- Factors that can affect radon levels include local geology, construction materials and how the home was built.
- Levels can vary from home to home, it's very unpredictable.
- You cannot see it, smell it or taste it
- After smoking, radon is the second leading cause of lung cancer in the United States
- For non-smokers, Radon is the leading cause of lung cancer
- US EPA estimates that radon causes about 21,000 lung cancer deaths each year.
- There is a linear relationship between radon and lung cancer: As radon levels increase, the risk of lung cancer increases

#### RADON LEVEL AVERAGES: US vs STATE vs COUNTY

- The national average of radon is 1.3 pCi/L
- California average is 0.85 pCi/L
- Nevada County average is 3.1 pCi/L

The EPA action level is 4.0 pCi/L. Twenty six percent of home in Nevada County have radon levels greater than 4 pCi/L ([county-radon.info/CA/Nevada.html](http://county-radon.info/CA/Nevada.html))

According to the California Department of Health, in Grass Valley,

- Testing of 315 homes in 95945 resulted in 66 tests (21%) of homes  $\geq$  4.0 pCi/L with a maximum result of 29.5 pCi/L.
- Testing of 232 homes in 95949 resulted in 22 tests (9.5%) of homes  $\geq$  4.0 pCi/L with a maximum result of 14.3 pCi/L
- Testing of 340 homes in 95959 resulted in 59 tests (17.4%) of homes  $\geq$  4.0 pCi/L with a maximum result of 28.6 pCi/L

The Brunswick Site is located in the zip code 95945.

Since radon seeps into your home from several sources: fractured bedrock, groundwater, soil and well water...

#### WILL THE REOPENING OF THE IMM AFFECT RADON LEVELS IN GRASS VALLEY?

Rise did test groundwater from some drains and the New Brunswick shaft for radionuclides: uranium, Ra226, Ra228, and gross alpha emitting particles. Ra226 and Ra228 are precursors for radon. The maximum contaminant level for both combined is 5 pCi/L (3 for 226 and 2 for 228). The detection level is 1 pCi/L. All test results were below the maximum contaminant level.

However, in 2006, the state of California adopted new Public Health Goals for Ra226 and Ra228. The new goal for Ra226 is 0.05 pCi/L and the new goal for Ra228 is 0.019 pCi/L. The combined values at 0.069 are below the current detection level of 1 pCi/L but these new goals demonstrate that the state recognizes the health risk for lung cancer from radionuclides exposure. Now looking at the groundwater test results under these criteria, all Ra226 and Ra228 results meet or exceed these PHGs.



↑ Over the last decade, several studies have concluded that elevated radon concentrations could be a sign of an imminent earthquake. Radon is released from cavities and cracks in the rocks and soil due to "a slight compression of pore volume that causes gas to flow out of the soil".

1900 pounds of explosives will be detonated every day!

WILL THE CONTINUOUS EXPLOSIVES USE AND TUNNEL EXCAVATIONS LEAD TO INCREASED ROCK FRACTURES AND FISSURES THEREBY INCREASING RADON LEVELS IN OUR COMMUNITY?

HOW WILL THE COUNTY MONITOR RADON LEVELS AT THE MINE AND THROUGHOUT THE COMMUNITY?

Thank you,



Pam Heard RRT

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Mar 25, 2022

To: Matt Kelley, Senior Planner

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Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR.

MISCELLANEOUS PURSUITS

	<b>DEIR pg 2-74 section 4.6-7 “potential for geologic related impacts and hazards”</b>
<b>Ind 634-59</b>	Inclusion of hexavalent chromium (from unknown quantities in cement) and radon as TACs (toxic air contaminants). Emissions have not been calculated or included in the Air Quality Report, particularly in the Health Risk Assessment.
<b>Ind 634-60</b>	What is the potential of unknown quantities of cement utilized in the CPB placed in the mine stopes to leach hexavalent chromium into groundwater or surface water supplies? Especially after reflooding occurs after reclamation?
<b>Ind 634-61</b>	ANFO is classified as a TAC and is hazardous to aquatic life. Since water will be used to control fugitive dust released from explosions, how will this water be recovered and treated? Is there potential for any of this contaminated water to enter the groundwater or surface water systems? Will impacts increase when flooding occurs after reclamation?
<b>Ind 634-62</b>	Asbestos is classified as a TAC. Asbestos will be found in water used for fugitive dust control, water curtains, equipment decontamination (ASUR Plan), shower and laundry effluents (pg 2-73). How will this water be recovered and treated? Is there potential for any of this contaminated water to enter the groundwater or surface water systems?
<b>Ind 634-63</b>	<b>DEIR pg 3-40:</b> “Underground mining service water: Such uses include water use for dust suppression in rock drills and blasted rock piles, which is piped into the mine workings. Net consumption of water would not result from such activities, because water in underground workings is pumped to the surface for reuse.”  Is there potential for these contaminants to enter the groundwater or surface water systems, if not immediately then when mine is flooded during reclamation?

1



<b>Ind 634-64</b>	<p><b>DEIR pg 2-18 Table 2.1 item (b)</b></p> <p>What dust suppressants and chemical stabilizers will be used, and in what quantities?</p> <p>Investigate dust suppressants and chemical stabilizers for their impacts on vegetation (premature death) resulting in:</p> <ul style="list-style-type: none"> <li>-Lack of forage for wildlife, impact on wildlife from decreased food supplies</li> <li>-Increased flammability</li> </ul> <p>Investigate impact on wildlife from ingestion of:</p> <ul style="list-style-type: none"> <li>-Contaminated forage</li> <li>-Contaminated groundwater/surface water</li> </ul> <p>Investigate dust suppressants and chemical stabilizers for their impacts on aquatic systems</p> <p>Investigate dust suppressants and chemical stabilizers for their impacts on soil ecology</p>
<b>Ind 634-65</b>	<p><b>DEIR pg 3-40:</b> "Lighting during nighttime hauling and dumping of engineered fill would be limited to haul truck headlights."</p> <p>How can dust suppression be monitored in the dark?</p>
<b>Ind 634-66</b>	<p><b>DEIR pg 2-19 (d) and (e)</b></p> <p>Installation of wind barriers:</p> <p>What are the aesthetic impacts from wind barriers: height, width, color, location?</p> <p>What are the impacts on noise pollution?</p> <p>What is impact on wildlife, especially birds?</p> <p>What is impact on pollutant stream direction?</p>
<b>Ind 634-67</b>	<p><b>Application Documents-Project Information Questionnaire-Revision 1</b></p> <p>Security Fencing will be used to restrict access to portions of the Brunswick site. Fencing will be metal chain link and range in height in accordance with Nevada County Code Sec. L-II 4.2.6</p> <p>No mention of fencing or signage required around capped toxic soil (5.6 acres) on Centennial site as mentioned in RAP.</p> <p>What impacts will these fences have on aesthetics and wildlife?</p>
<b>Ind 634-68</b>	<p><b>Initial Applications Documents-Brunswick Industrial Site-Hazardous Materials Inventory Statement</b></p> <p>Investigate flotation compounds. The Air Quality Report Nov 2021 (pg 297, Idaho-Maryland Mine Project Reagent Use lists the following:</p> <p>Promoter 100 pounds per day Aerophine 3418A Note: no information is available online (only by direct request from manufacturer) but it is a phosphine-based collector</p> <p>Promoter 50 pounds per day Aerofloat 208</p> <p>Frother 80 pounds per day Aerofroth 70 - MIBC</p> <p>Flocculant 80 pounds per day Magnafloc 10</p> <p>Descaling 264 gallons per month Scaletrol PDC9401</p>





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<b>Ind 634-69</b>	<p>The collector and promoter, AERO MAXGOLD 900 and AERO 407 respectively, are especially toxic to aquatic life with long lasting effects. What quantities will be used and what residual amounts will contaminant the tailings used for engineered fill? Calculate amounts that will leach from tailings platforms into storm drainage system with exits to waterways. This situation will occur at both the Centennial and Brunswick sites and wherever engineered fill utilizing sand tailings is transported.</p>
<b>Ind 634-70</b>	<p>DEIR pg 4.7-29 states that these chemicals will be removed using filter presses during water removal. How is this verified? Will the tailings be tested for residual reagents contamination?</p> <p>What will be the cumulative effects on terrestrial and aquatic environments from these agents? Are these compounds monitored by waterboard as a condition of discharge?</p> <p>Notably, the effects of the promoters have been left out of the descriptions under <i>Use and Storage of Various Chemicals</i> DEIR pg 4-7.28 &amp; 29 while the effects of the less toxic chemicals (flocculant, frother) are included.</p> <p>(CuSO4.5H2O, PAX potassium amyl xanthate, AERO 208, Aerofroth 65 and Soda Ash were used in flotation study by McClelland Laboratories, pg 556 Appendices)</p>
<b>Ind 634-71</b>	<p>DEIR pg 2-78 Section 4.7-4 “Impair implementation of or physically interfere with adopted emergency response plan or emergency evacuation plan”</p> <p>Investigate flammability of all Hazardous Materials Inventory. Verify accuracy of listed materials.</p>
<b>Ind 634-72</b>	<p>Review evacuation routes and perform mock scenarios for community preparedness. Study interagencies dependence/access to Air Park.</p>
<b>Ind 634-73</b>	<p>Grass Valley Air Attack Base and Grass Valley Emergency Command Center are both located at the Nevada County Air Park (DEIR pg 4.13-8). These critical facilities are located in a Very High Fire Hazard Severity Zone.</p>
<b>Ind 634-74</b>	<p>In August 2021, the Bennett Fire burned approximately 59 acres, comprising most of the Centennial Industrial Site. (DEIR pg 4-13.3) Sierra Nevada Memorial Hospital and Skilled Nursing Facilities were told to “shelter in place” as others in the surrounding area were evacuated. The majority of these “others” consisted of seniors in low-income apartment complexes just north of Centennial site.</p>
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	<p>DEIR pg 4-7.10: "Shelter-In-Place - Advises people to stay secure at their current location by remaining in place as evacuation will cause a higher potential for loss of life."</p> <p>DEIR pg 4-13.13</p>
<b>Ind 634-75</b>	<p>Does the new proposed Nevada County Emergency Operations Plan-Mass Evacuation Annex include incidents of fire caused by accidents related to Rise operations to include potential transportation (off-site), explosives use (off-site), storage of flammable hazardous materials (on-site), etc.?</p> <p>DEIR pg 4-13.15 "Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire."</p>
<b>Ind 634-76</b>	<p>DEIR pg 4-13.3 "Prevailing Winds: The predominant wind direction at the project site area is from the North-East and South-West directions. This suggests, for example, that a fire burning in the forested terrain southwest of the Centennial and Brunswick Industrial Sites could burn through the Sites due to prevailing southwesterly winds."</p> <p>Challenge with WeatherSpark data model weighted 67% from Nevada County Air Park showing wind is from the south 7.4 months of the year and from the East 4.6 months of the year. The Nevada County Air Park is 4000 ft from the Brunswick Site. These wind directions confirm that a fire burning from the southwest forested terrain would not only burn through the sites but through the entire town of Grass Valley.</p> <p>And an isolated fire burning on the Brunswick site has the potential to ignite numerous flammable materials releasing hazardous pollutants which would then be transported by prevailing winds into Grass Valley and environs. This fire would then have the potential to ignite a wildfire too.</p>
<b>Ind 634-77</b>	<p>DEIR pg 4-13.26: "In addition, although runoff from both Sites flows into creeks, the project includes drainage facilities to capture runoff prior to entering the creeks. Should a fire occur on one or both of the Sites, the proposed drainage facilities would capture and slow postfire runoff, thus minimizing flooding potential downstream."</p> <p>What about the runoff of pollutants entering the creeks postfire?</p>
<b>Ind 634-78</b>	<p>DEIR pg 4-13.11 "Policy FP 10.7.3: Projects requiring a traffic study shall include in such study an assessment of the current emergency evacuation capacity of the public and/or private roads that serve the proposed project, and recommended mitigation that will increase the evacuation capacity, if needed."</p> <p>DEIR pg 4-13.17 "Operation of the approximately 7.4 haul trucks per hour attributable to the proposed project could either be temporarily ceased and/or these trucks could pull off the road to enable residents to evacuate as quickly and expeditiously as possible."</p> <p>There is no room for any truck or car to pull off the road. Brunswick Road is a narrow two-lane road with limited shoulder widths (if available at all) and embankments on both sides. In the event of an evacuation, both lanes should be one-directional. With trucks travelling on both lanes, evacuation will</p>



	<p>be unable to occur in either direction. Also, truck deliveries that occur via SR49 through narrow congested intersections leading to the primary evacuation route may be compromised.</p>
<b>Ind 634-79</b>	<p>How can Brunswick Road be considered a minor arterial road when 118 haul truck round trips per day are warranted for Rise operations? DEIR pg 4-7.38 This does not include the additional (up to) 18 semi-truck deliveries per day. DEIR pg 4-7.37</p> <p>Yet, Brunswick Road has been defined as a minor arterial road, a secondary evacuation route only used by residents for evacuation. DEIR pg 4-7.37</p>
<b>Ind 634-80</b>	<p>DEIR pg 4-7.39: "While the proposed project would involve haul of hazardous materials to and from the Brunswick Industrial Site via Brunswick Road, no other cumulative projects are anticipated to similarly haul hazardous materials along Brunswick Road on an ongoing basis."</p> <p>What about the Loma Rica Business Park on Loma Rica Drive? There is only one-way ingress/egress via Brunswick Road. This business park contains all of the county propane suppliers, Apria Healthcare (delivers oxygen to county residents) and multiple auto businesses using welding gases. (Hazmat Class 2) The signal at Brunswick Road and Loma Rica Drive intersection currently has a right turn on red for traffic entering Brunswick Road northbound onto Brunswick Road. There is a steep decline in elevation from this point. How will a haul truck or semi-trailer decelerate to prevent collisions with a vehicle turning right on red from this intersection?</p>
<b>Ind 634-81</b>	<p>DEIR pg 4.12-21: "Goal MV-4.1 Provide for the safe and efficient movement of people and goods in a manner that respects the rural character of Nevada County."</p> <p>How will this goal be achieved on Brunswick Road given increased amounts of truck traffic?</p>
<b>Ind 634-82</b>	<p>DEIR pg 4-13.24 and pg 3-39: "The project would install two, 12,000-gallon above-ground diesel fuel storage tanks on the Brunswick Industrial Site.</p> <p>This is the first mention of two diesel fuel storage tanks. All other consultant documents refer to one 30,000 gallon storage tank at the Brunswick site.</p>
<b>Ind 634-83</b>	<p><b>DEIR pg 2-85</b></p> <p>Rise will pay for monthly fixed service charges of use of up to 400 gallons per day. What about drought surcharges? What about drought limitations on volumes in the future?</p> <p>...Until sold or annexed into city of Grass Valley. Why should the homeowner with a pre-existing well that was destroyed by Rise now have to pay for water just because of annexation? They would have had a well water supply regardless of annexation status. If these rights don't transfer with a sale, then the homeowner should be paid for loss of the well. The existing well is a component of the property value. NID connection is part of the property value as well, however the water from the well itself has been excluded in this valuation.</p>



<b>Ind 634-84</b>	<p>DEIR pg 3-21 &amp; 22 There is much discussion regarding the ventilation system including a Main ventilation fan and secondary fans-no mention of any type of filtration.</p> <p>“Once the service raise is completed and the permanent ventilation system is constructed, the primary ventilation fans would be located underground and the temporary ventilation fan on the surface at the Brunswick shaft would be removed.”</p> <p>This sentence mention primary ventilation fans, plural. The Air Quality and Greenhouse Gas Report lists the quantity of main ventilation fans as 3 on page 27. Booster and auxiliary fans are mentioned on page 26 in addition to the 3 main ventilation fans.</p> <p>How many main/primary fans are there?</p> <p>The number of fans is critical since the fan(s) is (are) emission source(s) in the Health Risk Assessment. (Pg 8, HRA, Appendix B, AQ Report 2021)</p>
<b>Ind 634-85</b>	<p>DEIR pg 3-28: “During normal operations, an average of one 7,500-gallon fuel tanker would travel to/from the sites every two weeks, using Brunswick Road to SR 20/49, over the 80-year term of the use permit. During any public safety power shutoffs (PSPS) events, a maximum of two fuel tankers per day would be required due to additional fuel demands associated with backup generators.”</p> <p>While predicting a PSPS event may be speculative, the emissions from the combustion of 15,000 gallons of diesel fuel per day is not speculative. These generators release emissions at 855°F to the ambient environment. There must be some accountability for the additional GHGs and carcinogenic DPM released from these emissions.</p> <p>What will be the consequences of excess diesel fuel usage not accounted for in estimated emissions?</p>
<b>Ind 634-86</b>	<p>DEIR pg 3-28 What is a sufficient insurance policy regarding explosives transport?</p> <p>For the first 6 months of construction, explosives will be delivered multiple time per week DEIR pg 4-7.26</p>
<b>Ind 634-87</b>	<p>DEIR pg 2-96 How long will the mine be blasting above the 1000 ft level?</p>
<b>Ind 634-88</b>	<p>DEIR pg 4.7-2: “Recognized Environmental Conditions (RECs) associated with the project sites. A REC indicates the presence or likely presence of any hazardous substances in, on, or at a property due to any release into the environment, under conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment.”</p> <p>“Similar to the cleanup of Areas B and C, the USTs would likely be considered HRECs provided that regulatory closure records are found.”</p>





Ind 634-89

Records have not been found for closure of Area B (drum spill) or Area C (disposal site) along with a 1000 gallon gasoline tank installed in 1977, a 12,000 diesel fuel tank installed in 1977 and a 1000 gallon tank with unknown installation date. DEIR pg 4.7-7 & 8

DEIR pg 4-7.18: "The hazardous materials business plan program requires businesses in Nevada County to prepare plans detailing facility information, a hazardous materials inventory, and an emergency response plan if hazardous materials storage equals or exceeds minimum reportable quantities, which are: 55 gallons of a hazardous liquid; 500 pounds of a hazardous solid; or 200 cubic feet of a compressed gas. The NCEHD provides access to the information in the hazardous materials business plans to emergency response agencies, including fire and police."

Has this plan been submitted?

DEIR pg 4.12-23: "The LTMF is based on total thousand square feet of buildings. The project proposes 126,000 square feet of industrial buildings and will be required to pay the LTMF. The current fee would be calculated as  $126 \text{ TSF} \times \$442.44 = \$55,747.44$ . The actual fee paid will depend on the mitigation fee in place at the time of construction.

How is the Mitigation fee calculated? What actual amount will be paid?

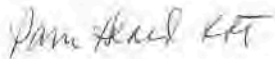
DEIR pg 4.12-24: "The GVTIF is based on total thousand square feet of industrial buildings. The project proposes 126,000 square feet of industrial buildings and will be required to pay the required GVTIF. The current fee would be calculated as  $126 \text{ TSF} \times \$666.66 = \$83,999$ , and an administration fee of 1% = \$839.99. The actual fee paid will depend on the mitigation fee in place at the time of construction.

Why is the City of Grass Valley entitled to more revenue when the most impacted road, Brunswick Road, is located in the County?

DEIR pg 4.12-25: "The project proposes 126,000 square feet of industrial buildings and will be required to pay the required RTMF. The current fee would be calculated as  $126 \text{ TSF} \times 5.33 \times \$79.37 = \$53,303.30$ . The actual fee paid will depend on the mitigation fee in place at the time of construction.

Who receives this money? Are these funds sufficient?

Thank you,



Pam Heard RRT

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Mar 25, 2022

To: Matt Kelley, Senior Planner

Nevada County Planning Department  
950 Maidu Ave, Suite 170  
Nevada City, CA  
530-265-1423  
Matt.Kelley@co.nevada.ca.us  
Idaho.MMEIR@co.nevada.ca.us

Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR.

#### SAMPLING PROCEDURES

Ind 634-91

Page 93 of the *Groundwater Hydrology and Water Quality Analysis Report*, EMKO states that Rise completed 19 drill core holes, totaling 67,500 linear feet, from 2017-2019. The sampling pattern was to drill 90 feet, pull a 10-foot sample segment, drill another 90 feet, etc. The drill logs are not available for review; the actual dates, precise locations, drift angles, widths, final depths, etc. are unknown.

"The cores were sawed in half in zones of interest and sent to ALS in Reno, Nevada to be assayed. ALS Laboratories crushed and homogenized the sample to ~2 mm size, split a 1 kg sample, pulverized the split sample, and assayed a split of the pulverized sample." (*Groundwater Hydrology and Water Quality Analysis Report* pg 93) Samples were received on 02.20.2019 with a finalized date of 03.05.2019. (*Appendices: Groundwater Hydrology and Water Quality Analysis Report* pp 515-516)

After assay for gold, the samples were subjected to additional testing at different laboratories.

Ind 634-92

#### METALS ANALYSES, DI-WET, ABA, WET CHEMISTRY PARAMETERS

##### FLOTATION COMPOSITE- McClelland Labs

"A composite sample was prepared from 76 samples of the ~2 mm material remaining from assaying. A portion of the material was weighted to represent the interval length and merged to make the metallurgical sample. Sufficient material was available for most samples, except for five samples where no material was available from the assay lab. The 76 samples created a composite metallurgical sample of approximately 46 kilograms (kg) (100 pounds)". (*Groundwater Hydrology and Water Quality Analysis Report* pp 95-96). This composite was sent to McClelland Labs in July 2019 which then homogenized the sample and split it into 4 sub-samples, F1-F4 flotation tailings samples. Page 537 of *Appendices: Groundwater Hydrology and Water Quality Analysis Report* states: "A total of 7 buckets containing 6 separate samples were received from the Maryland mine on July 10, 2019. The



	<p>samples weighed 4 to 47 kg, and appeared to be approximately -6 mm in size. The largest sample ("flotation composite") was intended for analysis..."</p> <p>Is the material 2 mm or 6 mm in size? What is the exact provenance of the 76 samples that comprise the composite as it relates to the 47 cores submitted for assay?</p> <p>After flotation testing, these samples were shipped from McClelland Labs to a geologist at Benchmark Resources in Folsom, CA during November 2019 who then submitted the samples to ACZ Laboratories in Steamboat CO. These samples, F1-F4, were then analyzed by ACZ for total metals, DI-Wet metals, Static Acid-Based Accounting and wet chemistry parameters.</p>
<p><b>Ind 634-93</b></p>	<p>BARREN ROCK-ACZ Laboratories</p> <p>On October 29, 2019 a geologist with Benchmark Resources selected barren rock samples: MA-1, MS-1, MA-2, MAA-1, S-1 and MA-3 from Rise Grass Valley. These samples were from 3 different cores [1 sample from I-18-10, 1 sample from I-18-11 and 4 samples from I-19-13 (<i>Groundwater Hydrology and Water Quality Analysis Report, EMKO pg 93</i>)], with combined segments equaling 34.1 linear feet. This represents only 0.05% of 67,500 total linear feet.</p> <p>They were submitted to ACZ Laboratories in November 2019 to be tested for total metals, DI-WET metals, Static ABA and wet chemistry parameters.</p>
<p><b>Ind 634-94</b></p>	<p>METALS ANALYSES-BARREN ROCK CRUSHED CORES-ACZ Laboratories</p> <p>Samples submitted for metals testing with identifiers can be found in Table 4-9 Barren Rock Crushed Core Samples: Total Metals Results in <i>Groundwater Hydrology and Water Quality Analysis Report, EMKO pp 101-102</i>.</p> <p>Regarding the barren rock crushed core metals analyses, only 5 cores were tested which means that only 26% of the 19 total cores were sampled [1 sample from B-18-02, 3 samples from I-18-10, 1 sample from I-18-11, 2 samples from I-18-12 and 40 samples from I-19-13 (<i>Groundwater Hydrology and Water Quality Analysis Report, EMKO pp 101-102</i>)]. All five core segments combined length equal a total of 456.5 linear ft. These combined 10 ft segments represent only 0.68% submitted for testing compared to total of 67,500 ft. In general, each sample represents 10 linear feet. The diameter of the cores is not given. It is not stated how much material, weight wise or volume, is contained in each segment or specifically how that material is "homogenized" to obtain a representative sample for testing.</p>
<p><b>Ind 634-95</b></p>	<p>After assay at ALS Laboratories, the samples were labelled as "Pulp-2, Tailings= (assay pulp)". These 47 samples were then analyzed by ACZ Laboratories for total metals. The final weight used in metals analysis is 1-2 grams of material per sample.</p> <p>The reference for this "Crush and Pulverize" step is EPA 600/2-78-054 3.1.3 (Field and Laboratory Methods Applicable to Overburdens and Minesoils, March 1978 pp. 43-45). The Foreword states "This report provides chemical, physical, mineralogical, and microbiological procedures for the analysis of coal overburdens and the resultant minesoils. These step-by-step methods identify and measure rock and soil properties that influence advance planning, mining efficiency, post-mining land and water quality and long-range land use."</p>





Procedure (3.1.3):

1. Pour field sample onto a large square of brown paper. Spread material evenly and allow to air dry. NOTE: Sample may have to be mixed periodically to speed drying.
2. After drying, the field sample is split into two representative subsamples. One subsample is placed in a container, labeled, and stored for physical analyses or individual preference tests.
3. The other subsample is placed between two sheets of brown paper and crushed by moderately rolling over the top sheet with a rolling pin. This process is continued until the entire field sample has been processed. NOTE: Do not allow paper fragments to become incorporated with the soil sample. Do not crush rock fragments.
4. Pass the crushed material through a sieve with 19 mm openings and discard material retained on the sieve.
5. All material passing the 19 mm sieve is crushed to pass through a sieve with 6.35 mm openings.
6. Place sieved sample in a 1 liter container and cover. NOTE: Container should not be more than two-thirds full or mixing (step 7) will be impaired.
7. Tumble container end-over-end until material is thoroughly mixed.
8. Place three heaping teaspoons of the mixed material in the pulverizer. Material is pulverized until it passes a 0.25 mm (60 mesh) sieve. NOTE: A cast iron mortar and pestle can be substituted for the pulverizer.
9. Place pulverized material in a plastic vial for laboratory use.
10. Label vial with the sample identification shown on the field container.
11. Mix sample thoroughly by tumbling the vial end-over-end before subsampling for laboratory procedures (primarily chemical analyses).

After a sample is obtained, according to test method, M3050B (SW-846) Acid Digestion of Sediments, Sludges and Soils, a 1 gram (dry weight) of sample is digested for ICP-MS metals analyses testing. The digestate is then diluted to a final 100 ml volume. Flow injection volumes generally range from 20 $\mu$ l-200 $\mu$ l (microliter) from the 100 ml prepared volume. A  $\mu$ l (microliter) is equal to 0.001 milliliter(ml) or 1/1000<sup>th</sup> of ml. Analyses dilution factors range from 1 to 500. For reference: There are 1 million grams in a metric tonne.

All metals were digested using EPA Method 3050B. The results should be defined as the "Total acid soluble/recoverable metals" fraction since this method does not use hydrofluoric acid, thus it is unable to break down silicates. (EPA SW-846 Revision VI December 2018, Chapter 3, pg 4)

ACZ Laboratories did receive "pulp" samples, residual material after ALS gold assay analyses. "In addition to the barren rock samples, Rise provided 48 crushed core samples, taken from ~2 mm assay rejects, for trace element test work." (*Groundwater Hydrology and Water Quality Analysis Report, EMKO, pg 95*) The actual number of samples was 47.

The barren rock samples must be pulverized prior to acid digestion just as the 47 "pulp" samples were pulverized prior to analysis for metal analyses. Any conclusions comparing metals content, leachate capacity, ABA, etc. between pulp results and barren rock results is moot since the sample preparation (pulverization) is identical.

Ind 634-96

TESTING TIMELINES



After exploratory drilling, cores were sent to ALS Laboratories which were received on 02.20.2019. Date finalized 03.05.2019. "The cores were sawed in half in zones of interest and sent to ALS in Reno, Nevada to be assayed. ALS Laboratories crushed and homogenized the sample to ~2 mm size, split a 1 kg sample, pulverized the split sample, and assayed a split of the pulverized sample." (*Groundwater Hydrology and Water Quality Analysis Report* pg 93)

Then the composite sample was prepared and sent to McClelland Labs for flotation testing from July 2019- November 2019. Samples F1-F4 were then sent to ACZ Laboratories for metals testing, DI Wet testing, ABA and wet chemistry parameters. The Flotation Results Report from McClelland Labs was not submitted to Rise until January 29, 2020.

Also in November, 2019, the 47 crushed core samples were sent to ACZ for metals testing along with the six barren rock samples to be tested for metals, DI WET metals, ABA and wet chemistry parameters.

It is difficult to understand how the composite sample was prepared and analyzed months before the individual samples (barren rock and barren rock crushed core) were submitted to ACZ in November 2019. The chains of custodies do not reflect the written account. Other than the out-going COC from McClelland to Benchmark Resources regarding F1-F4 samples, all sample shipments originate from Rise Grass Valley. The transitions between the various laboratories are not documented regarding dates, amounts, sample containers, etc.

#### SAMPLE POPULATIONS

##### FLOTATION COMPOSITE

"A total of seven buckets containing six separate samples were received from the Maryland Mine on July 10<sup>th</sup>, 2019. The samples weighed 4 to 47 kg, and appeared to be approximately 6 mm in size. The largest (flotation composite") was intended for analysis and metallurgical testing as well as environmental characterization of the testing products... The five remaining samples were indicated to be waste rock samples of various types for environmental characterization. Preparation and analysis of the waste rock samples will be discussed in a separate report." (*Appendices: Groundwater Hydrology and Water Quality Analysis Report: Appendix H, pg 2*)

"The rougher tailings from two selected tests were also subjected to environmental characterization (discussed in a separate report)." (*Appendices: Groundwater Hydrology and Water Quality Analysis Report: Appendix H, pg 4*)

The flotation composite arriving in a bucket is not a very specific provenance considering that these tailings will be used to determine heavy metal leachates. What material was in this bucket?

What is environmental characterization of the testing products? What is the environmental characterization of the waste rocks? Where is the separate report that describes the preparation and analysis of the waste rock and rougher tailings for "environmental characterization"? Is the environmental characterization part of the Cement Paste Backfill study?

Ind 634-97





	<p><b>BARREN ROCK SAMPLES</b></p> <p>The three cores represent a 15.8% sample population when compared to 19 total cores. Samples MA-1(I-19-13), MS-1(I-19-13), MA-2 (I-19-13), MAA-1(I-19-13), S-1(I-18-11) and MA-3 (I-18-10) were each tested for barren rock total metals, barren rock leachate DI-WET, barren rock Static Acid-Based Accounting, and Wet Chemistry parameters. In addition, samples MA-1, MS-1 and MA-1 were assayed for gold determination.</p>						
	<p><b>BARREN ROCK CRUSHED CORE SAMPLES</b></p> <p>Metals analyses for forty out of forty-seven representing 85% of the total rock core samples were from a single drill core, I-19-13, at various depths (167 ft bgs to 4774.6 ft bgs = 4607.6 total feet). These samples represent 6.8% sample population when compared to 67500 total linear feet. In addition, 25% of this core is missing between depths 3227.0-3583.0 = 356 ft, 3969.7-4313 = 343.3 ft and 4323.0-4767.9 = 444.9 ft. These missing sections total 1144.2 ft out of 4607.6 feet. The remaining 3463.4 feet represent a 5.1% sample population compared to the 67500 total linear feet.</p>						
	<p><b>CONCLUSION</b></p>						
Ind 634-98	<p>It is obvious that very limited sampling and testing has been done. Only one sample, B-18-02, was analyzed from the "Brunswick" area- metals analyses were performed on the barren rock crushed core sample. Rise plans to mine in this area immediately along with the installation of major infrastructure.</p>						
Ind 634-99	<p>There are egregious issues with the Chains of Custody regarding sample dates, locations and quantities. Samples from only 5 cores are represented out of 19 total cores. Eight percent of total metals analyses (barren rock crushed cores) were performed on one core, I-19-13, while 67 % of barren rock total metals, leachate Di-WET testing, wet chemistry along with ABA testing were performed on this same core.</p>						
Ind 634-100	<p>There are inconsistencies and omissions within this limited sampling as well. For example, S-1 is taken from core I-18-11 at a depth of 4725.6'-4725.7'. This is a total of 0.1 feet or 1.2 inches. The diabase sample above it (Y973586) is taken at 4107.8-4117.55'. What is between these two samples with 608.05 feet missing? Where did the serpentinite layer begin? How deep is the serpentinite layer beneath since sampling stopped after 1.2 inches?</p>						
Ind 634-101	<p>Sample (Y973596) from core I-19-13 at 4767.9'-4772.7' is listed as MA in the Hydrology report but as Meta volcanic serpentinite on ALS COC. Sample (Y973597) from core I-19-13 taken from 4772.7'-4774.6' is serpentinite also. What is below this level where sampling stopped after 1.9 feet? This is known serpentinite containing asbestos.</p>						
	<p><b>QUALITY CONTROL ISSUES</b></p>						
Ind 634-102	<p>Regarding static acid-base-accounting, page 510 of the <i>Appendices: Groundwater Hydrology and Water Quality</i> states that the following parameters are not offered for certification or are not covered by NELAC certificate #ACZ:</p> <table border="0"> <tr> <td>Neutralization Potential as CaCO<sub>3</sub></td> <td>M600/2-78-054 NV Modified Sobek Procedure</td> </tr> <tr> <td>pH, Saturated Paste</td> <td>EPA 600/2-78-054 section 3.2.2</td> </tr> <tr> <td>Sulfur HCl Extractable</td> <td>M600/2-78-054 3.2.4 &amp; 3.2.6 Modified Sobek Procedure</td> </tr> </table>	Neutralization Potential as CaCO <sub>3</sub>	M600/2-78-054 NV Modified Sobek Procedure	pH, Saturated Paste	EPA 600/2-78-054 section 3.2.2	Sulfur HCl Extractable	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek Procedure
Neutralization Potential as CaCO <sub>3</sub>	M600/2-78-054 NV Modified Sobek Procedure						
pH, Saturated Paste	EPA 600/2-78-054 section 3.2.2						
Sulfur HCl Extractable	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek Procedure						





Sulfur HNO3 Extractable Procedure	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek
Sulfur Hot H2o Extractable Procedure	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek
Sulfur Residual Procedure	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek
Sulfur Total Procedure	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek

Lack of certification impacts validity of acid-base-accounting results for all samples: MA-1, MA-2, MA-3, MAA-1, MS-1, S-1, F-1, F-2, F-3 and F-4 (pp 495-504, Appendices: *Groundwater Hydrology and Water Quality Analysis Report*).

SILICA

Toxic air contaminants, silica and asbestos, will be produced daily in massive quantities. Silica content is assumed as 60% quoting a textbook definition of andesite rock composition. But 98% of the total rock mined is assumed to be meta-andesite. Regarding rock composition, meta-andesite rock is not just andesite....it has undergone metamorphosis becoming altered in composition. Johnston (1940) stated: "The degree of metamorphism may vary in this unit, such that parts of it have been referred to as amphibolite schist, porphyrite, diabase, and quartz porphyrite." (*The Gold Quartz Veins of Grass Valley, referenced in Groundwater Hydrology and Water Quality Analysis EMKO pg 9*)

Ind 634-103

500 tons of barren rock will be mined each day.

Mineralized ore rock, gold in quartz (100% silicon dioxide) veins, has not been accounted for in silica calculations.

1000 tons of ore rock will be mined each day.

Silica content was not tested on any samples even though the methods utilized, ICP-MS, can analyze for both Silicon (Si) and Silica (SiO<sub>2</sub>) and more specifically can be performed by their contracted laboratory-ACZ Laboratories (*ACZ Analytical Capabilities 2017*).

What is the actual silica content of the barren rock and ore rock?

ASBESTOS

Forty-two samples were analyzed for asbestos: two blanks, 2 Centennial tailings and 38 drill core samples. The core samples were from 6 of 19 (32%) of total cores drilled by Rise: 9 samples from I-18-11, 1 sample from I-18-12, 9 samples from I-19-13, 7 samples from I-19-13A, 8 samples from I-19-14 and 4 samples from I-19-14A. The average overall length of the sample cores tested was 5.34 inches. Drilling was stopped when asbestos was detected. Drill logs are not available, therefore unable to determine depth or width of serpentinite deposit encountered. Asbestos sampling was limited. Centennial tailings were only identified by grid number-no information as to quantity, location, depth, etc.

Ind 634-104

Rise states that 1% of material mined each day will be serpentinite (*Groundwater Hydrology and Water Quality Analysis Report, pg 93*). Yet all of the geological maps located in the *Technical Report for the Idaho-Maryland Mine Project* show the quartz veins running with the



↑ contact points of the faults along the serpentinite deposit (AMEC 2017 pp 7-17, 7-23, 9-9, 9-11, 9-26).

The *Air Quality and Greenhouse Gas Emissions Analysis Technical Report: Earthwork and Material Handling Fugitive Dust: Construction Activity Fugitive Dust* Nov 2021 pg 300 states that the serpentinite concentration of Mine Fill will be 14.3%. How can the mine fill concentration be seven parts serpentinite when it comprises only 1 % of material mined?

"Exploration drilling was designed to test a variety of mineralization throughout the deposit in areas where mining is expected to occur." (pg 93, Hydrology Report) "Rise selected mineralized samples for metallurgical testwork by reviewing drill logs and maps. Samples were selected to represent (sic) materials representative of future mining. Factors considered in selection were gold grades, minimum mining widths, mineralization style, and locations throughout the potential mining areas." (pg. 95 Hydrology Report)

CONCLUSIONS

**Ind 634-105**

How can the actual ratios of rock mined be known based on this work? This information is necessary to determine emissions of toxic air contaminants such as heavy metals, silica and asbestos.

**Ind 634-106**

Why wasn't more testing done on the Brunswick area since mining is anticipated to begin there immediately along with the installation of major infrastructure?

**Ind 634-107**

How can the data from this limited sampling be extrapolated to 2585 acres being mined to unknown depths for the next 80 years?

Thank you,



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## **INDIVIDUAL LETTER 634: PAM HEARD**

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### **Responses to Comments Ind 634-1 through Ind 634-35**

These comments are a duplicate copy of content in Group Letter 7. Please see Responses to Comments Grp 7-103 through Grp 7-137.

### **Responses to Comments Ind 634-36 through Ind 634-52**

These comments are a duplicate copy of content in Group Letter 7. Please see Responses to Comments Grp 7-138 through Grp 7-154.

### **Response to Comment Ind 634-53**

The commentor asks whether all TACs from diesel fuel consumption have been included beyond just the DPM emissions. The commentor also noted that diesel fuel is comprised of various toxic air contaminants. As stated in Appendix D of the OEHHA 2015 Air Toxics Hot Spots Program Risk Assessment Guidelines, the surrogate for whole diesel exhaust is diesel PM. PM<sub>10</sub> (particulate matter, ten microns or less in size) is the basis for the risk calculations. The health risk assessment calculates health risk from diesel exhaust emissions based on estimated PM<sub>10</sub> diesel particulate emissions. Therefore, based on OEHHA unit risk factors and guidelines, the health risk assessment conducted for the project accounts for all toxic air contaminants present in diesel exhaust. The cancer and chronic risk from exposure to project-generated construction and operational TAC emissions is adequately addressed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), Impact 4.3-2, of the DEIR. The DEIR included an HRA (see Appendix E.1 of the DEIR) to estimate the Maximum Individual Cancer Risk, Chronic Hazard Index, and Acute Hazard Index for residential receptors as a result of project emissions from the diesel trucks and offroad equipment; diesel-fueled generators; benzene, toluene, and xylene working and breathing loss emissions from the diesel fuel storage tank; underground blasting; ore processing; earthwork and material handling; and truck idling emissions. The HRA assessed the health risk from TAC emissions from project construction and operation and concluded that the cancer risk would be less than significant with implementation of mitigation. Furthermore, the chronic and acute risk are considered less than significant.

### **Response to Comment Ind 634-54**

The comment notes that hexavalent chromium is found in the detonation of explosives and in Portland cement. As noted on page 4.8-47 of the DEIR, hexavalent chromium is present in cement in small quantities and usually at a concentration of about 40 ppm. Hexavalent chromium is a toxic air contaminant included in the OEHHA Air Toxics Hot Spots Program. Hexavalent chromium emissions from the project were estimated from blasting emissions underground and was included in the HRA.

### **Response to Comment Ind 634-55**

The commentor notes that further testing of the cement paste backfill formulation is required before it will be placed in the underground mine, including locating a cement supplier with low hexavalent chromium content, leachate testing and strength testing. A cement processing plant is not proposed for the project. Cement will be delivered to the Brunswick site and loaded into a silo adjacent to the processing plant. This cement then will be mixed with partially dewatered tailings in the paste backfill plant, inside the process plant, to create cemented paste backfill. The processing plant utilizes filtration baghouses for dust control as disclosed on page 295 of Appendix E.1.



The comment asks how the amount of hexavalent chromium can be estimated when a supplier or known composition of the cement is not known. CEQA requires a good faith effort to estimate emissions from the project during construction and operation. It is common that details such as particular suppliers or vendors for a project are unknown during the drafting of documents in support of CEQA. As such, estimation of emissions during the construction and operation of the project are based on project-specific information and industry-standard emission factors. However, as discussed in Response to Comment Ind 634-59 of the Miscellaneous Pursuits Letter, when accounting for the additional hexavalent chromium, no changes to significance thresholds would occur. Additionally, Mitigation Measure 4.8-1(d) requires the mine operator to submit a Report of Waste Discharge to the Central Valley Regional Water Quality Control Board, to ensure that the selected cement paste backfill formulation meets water quality standards. In response to the commenter's question, the requirement to submit a RoWD and obtain WDRs from the CVRWQCB will ensure that the level of hexavalent chromium will meet applicable standards. Please see Master Response 21 - Conservatism of Silica Assumptions.

### **Response to Comment Ind 634-56**

The commenter asks what type of ventilation will be used in the cement processing plant, and then asks how the DEIR can estimate the amount of hexavalent chromium when the supplier and composition of cement regarding hexavalent chromium and silica is unknown. A cement processing plant is not proposed for the project, so this would not be a source for Hexavalent chromium emissions. Cement will be delivered to the Brunswick site and loaded into a silo adjacent to the processing plant. This cement then will be mixed with partially dewatered tailings in the paste backfill plant, inside the process plant, to create cemented paste backfill. The processing plant utilizes filtration baghouses for dust control as disclosed on page 295 of Appendix E.1. Please refer to Response to Comment Ind 634-59 of the Miscellaneous Pursuits Letter for a complete response on Hexavalent Chromium.

### **Response to Comment Ind 634-57**

The commenter further asks how the DEIR can estimate the amount of hexavalent chromium when the supplier and composition of cement regarding hexavalent chromium and silica is unknown. Please refer to Responses to Comments Ind 634-55 and Ind 634-59 of the Miscellaneous Pursuits Letter for a complete response on Hexavalent Chromium.

### **Response to Comment Ind 634-58**

The commenter asks whether the use of explosives would cause increased Radon levels in the community and how the County would monitor Radon levels at the mine and throughout the community. The project does not have any potential to increase levels of radon present in homes near the project site and therefore no analysis of radon related impacts is required. Radon is not considered a toxic air contaminant by the OEHHA or CARB and does not have an associated reference exposure level. Please see Response to Comment Grp 8-15.

### **Response to Comment Ind 634-59**

The commenter asserts that air emissions related to hexavalent chromium and radon are not analyzed in the DEIR. Hexavalent chromium is a toxic air contaminant included in the OEHHA Air Toxics Hot Spots Program. Dust emissions from cement loading of the storage silo is estimated at 8.5E-3 pounds per day (3.86 grams per day) as shown on page 295 of Appendix E.1. As noted on page 4.8-47 of the DEIR, hexavalent chromium is present in cement in small quantities and usually is at a concentration of about 40 ppm in typical cement. Dudek prepared a memo which is attached to the Final EIR as Appendix R to clarify that hexavalent chromium content in cement does not present a risk to public health. Hexavalent chromium was evaluated by Dudek consistent





with the methodologies presented in the DEIR. Based on the quantity of dust emissions from cement loading and an assumption of 40 ppm hexavalent chromium content in cement, total air emissions of hexavalent chromium would be approximately 154 micrograms per day. There would be no change to the cancer impacts. The mitigated chronic non-cancer health risk would not change from the results in the DEIR. The mitigated acute non-cancer health impacts would increase from 0.004 in the DEIR to 0.1; however, this would remain well below the NSAQMD significance threshold of 1.0. As such, there would be no change to impact determination in the DEIR.

The project could not have any effect on radon present in homes near the project and therefore no analysis of radon related impacts is required. The commenter does not provide any evidence indicating that there is any potential for the project to result in Radon exposure. Please see Response to Comment Grp 8-15. Radon is not a toxic air contaminant in the Hot Spots Program, as such no reference exposure level is available to evaluate the health risk associated with radon.

### **Response to Comment Ind 634-60**

As discussed on page 4.8-48 of the DEIR:

Nevertheless, it is only during the mining phase that Cr<sup>+6</sup> could have any potential to leach from CPB, because that is when there would be air (oxygen) in the mine workings (Cr<sup>+6</sup> can only form under oxidizing conditions). Once the mine re-floods, reducing conditions (very low dissolved oxygen levels creating a negative oxidation reduction potential) would return in the mine workings, which would prevent any leaching of Cr<sup>+6</sup>. However, during mining, if there were any Cr<sup>+6</sup> in the water within underground workings due to groundwater inflow, it would be reduced to Cr<sup>+3</sup> (due to low oxygen levels in the water), which is relatively immobile in water and has a much lower impact on water quality than Cr<sup>+6</sup>.<sup>24</sup> Once the water was pumped from the mine any Cr<sup>+3</sup> would generally precipitate out of the water in the pond or be removed by the physical filtration unit in the WTP.

In addition, as discussed above, Mitigation Measure 4.8-1(d) requires the mine operator to submit a Report of Waste Discharge (RoWD) to the Central Valley Regional Water Quality Control Board, to ensure that the selected cement paste backfill formulation meets water quality standards. The requirement to submit a RoWD and obtain WDRs from the CVRWQCB will ensure that the level of hexavalent chromium will meet applicable standards.

### **Response to Comment Ind 634-61**

The commenter asks whether the project would have water quality impacts related to Ammonium Nitrate Fuel Oil (ANFO). As discussed on page 4.8-48 of the DEIR, the primary residual components of the ammonium nitrate-fuel oil (ANFO) used for blasting, ammonia and nitrate, are very soluble and mobile in water. This means that any blasting residuals would be continually removed from the mine over time through the dewatering system. The proposed WTP is designed to treat ammonia and other blasting residuals that might occur due to incomplete detonation. Thus, when the mine is allowed to flood again following the completion of mining, there is no reasonable potential that residuals from former blasting activities would cause a violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

### **Response to Comment Ind 634-62**

The commenter asks whether the project will result in impacts due to asbestos in water and asks how the water will be treated to remove asbestos. Water treatment at the project site will be conducted by removal of solids from water. The sumps or tanks used underground to collect water





are designed to remove the majority of solids from the water. The water would then be pumped to main underground sumps located on various levels, then to the surface water treatment pond. Solids would be removed from water at all these stages. Under the requirements of Order R5-2022-0006 the final discharge must have less than 10 ppm total suspended solids (Average monthly) and 7 MFL (millions fibers per liter) asbestos in water.

### **Response to Comment Ind 634-63**

Please see Responses to Comments Ind 634-61 and Ind 634-62.

### **Response to Comment Ind 634-64**

The commenter asks what dust stabilizers will be used and in what quantities, and generally asks what impacts could result to wildlife, fire risk, and groundwater/surface water. Please see Master Response 12 – Chemical Dust Stabilizers. The chemical stabilizers would be non-toxic, non-flammable and would therefore not result in impacts to wildlife, fire risk or groundwater/surface water.

### **Response to Comment Ind 634-65**

The commenter asks how dust suppression can be monitored in the dark. Dust generation from hauling and dumping of engineered fill during nighttime are limited to vehicle traffic on unpaved access roads and material handling of the truck drop onsite. As stated on page 38 of Appendix E.1, unpaved roads shall be treated with chemical stabilizers in order to control fugitive dust. This treatment is only done every few weeks<sup>6</sup> and therefore it is unlikely that it would be applied in the dark. Any dust control used on materials dropped by the truck at night would be from water sprays and does not require sunlight. Any air monitoring devices that are in place during operations would not require sunlight to function.

### **Response to Comment Ind 634-66**

The commenter asks what the aesthetic, noise, wildlife and pollutant stream direction impacts would be from installation of wind barriers. Wind barriers are one of several possible methods for dust control of inactive disturbed surface areas and storage piles that will remain inactive for more than seven days under the Asbestos Dust Mitigation Plan (ADMP). (see Page 2-19 of the DEIR.) The details of the ADMP will be determined during the submission and approval process with the Northern Sierra Air Management District. Only one of these methods is required and wind barriers may not be proposed in the ADMP. The commenter does not provide any evidence that wind barriers, if required by the NSAQMD as part of the ADMP, would have the potential to cause any significant impact, and there is no evidence that such impact could result. As such, the analysis of aesthetics, noise, wildlife, and pollutant stream impacts for wind barriers would be speculative and is not required under CEQA.

### **Response to Comment Ind 634-67**

The commenter asserts that the DEIR does not mention the fact that fencing will be installed around the Centennial Site, and asks what impacts will occur to wildlife due to fencing on both project sites. As stated on page 3-42 of the DEIR, all access locations at the project sites are gated and secured. Additional fencing around the aboveground facilities may be installed as part of the proposed project, if deemed necessary for security and safety. Additionally, private security services would be provided by the Project Applicant. Generally, this fencing would be along the Brunswick and E. Bennett Roads to discourage trespassers and around the paved areas of the main site where the mine entrances and facilities are located. Animals would be excluded from the operational areas of the site, but no barricades prevent them from using the undeveloped

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<sup>6</sup> See Table 11.1 of NIOSH Dust Control Handbook 2<sup>nd</sup> edition



areas of the site, including the South Fork Wolf Creek and the forest and meadows remaining on the property.

Proposed fences have been included in renderings prepared for the aesthetics report (Appendix D of the DEIR). Therefore, the aesthetics impact of the fencing has been evaluated.

**Response to Comment Ind 634-68**

Please see Master Response 10 - Explosives, Reagents, and Brunswick Fill.

**Response to Comment Ind 634-69**

AERO MAXGOLD 900 and AERO 407 are not proposed to be used by the project.

**Response to Comment Ind 634-70**

Please see Master Response 10 - Explosives, Reagents, and Brunswick Fill.

CuSO<sub>4</sub>, PAX, Aero 208, Aerofroth 65, and Soda Ash are not proposed to be used in mineral processing. Regarding the latter, pages 4.7-28 and -29 of the DEIR are hereby revised for clarification purposes, as follows:

The warehouse building would include storage of common reagents, such as collectors, promoters, frothers, and flocculants, all of which would be used in the gold recovery process conducted in the process plant. These reagents are needed in the gold recovery process to provide a more environmentally friendly alternative to cyanide, which will not be used. According to the Hazardous Material Inventory Statement for the Brunswick Industrial Site, common names of the proposed reagent chemicals include Aerophine, Methyl Isobutyl Carbinol (MIBC), ~~and Magnafloc 10, and Soda Ash~~. Aerophine is known as a promoter or collector, used in flotation to increase the floatability of minerals in order to effect their separation from the undesirable mineral fraction. Flotation is an industrial process for selectively separating valuable minerals from non-valuable minerals. The applicant has selected Aerophine over xanthates as the latter can generate carbon disulfide upon decomposition, which is known to be a highly toxic and flammable compound with potential risks to the health and the environment. Magnafloc 10 is known as a flocculant, which help aggregate fine suspended particles to form larger flocs so that the solids can more easily be separated from the water. Magnafloc 10 is not expected to bioaccumulate in organisms, its chemical family (polyacrylamide) is relatively non-toxic, and it is not readily biodegradable into more environmentally problematic chemicals.<sup>16</sup> MIBC is a frother used to create foam to facilitate froth flotation of gold minerals in the gold recovery process. Based on available data, MIBC has a low bioaccumulation potential and exhibits low toxicity to aquatic organisms.<sup>17</sup> ~~Soda Ash is used in gold flotation to control alkalinity.~~ These reagents have various properties, some of which are described above. Whereas some are flammable (e.g., MIBC), others are not (e.g., ~~Soda Ash~~). The reagents would be removed from the concentrate and sand tailings during the dewatering stage conducted in the process plant using filter presses. All reagents have specific storage requirements that would need to be met on-site, as verified by the Fire Marshall's Office prior to commencement of operations.

The above minor changes are for clarification purposes and do not alter the conclusions of the DEIR.

**Response to Comment Ind 634-71**

The flammability of reagents to be used in mineral processing is generally discussed in pages 4.7-28 and -29 of the DEIR.



### **Response to Comment Ind 634-72**

Evacuation routes are adequately assessed in Chapter 4.13, Wildfire, of the DEIR, in particular, Impact 4.13-1. Performing mock scenarios for community preparedness is beyond the scope of the EIR and not required pursuant to CEQA.

### **Response to Comment Ind 634-73**

The comment does not address the adequacy of the DEIR, but notes that Grass Valley Air Attack Base and Grass Valley Emergency Command Center are both located at the Nevada County Air Park, in a Very High Fire Hazard Severity Zone. The commenter's concern is unclear. The proposed project would not impact the Air Park.

### **Response to Comment Ind 634-74**

The comment does not address the adequacy of the DEIR but has been forwarded to the decisionmakers for their considerations. Please see Master Response 1.

### **Response to Comment Ind 634-75**

The Nevada County Emergency Operation Plan – Annex B – Mass Evacuations does not include incidents of fires caused by accidents related to Rise operations or any other project. As stated in Annex B, the purpose of the plan is to establish County, City and other agency responsibilities and concept of operation for support of a mass vehicular evacuation moving within or through the County that has been caused by a disaster or incident occurring outside of Nevada County.

<https://www.nevadacountyca.gov/DocumentCenter/View/15704/Annex-B---Mass-Evacuation-PDF>

The commenter's other statements in this comment do not relate to the adequacy of the DEIR. Comment noted.

### **Response to Comment Ind 634-76**

The commenter states that an isolated fire burning on the Brunswick site has the potential to ignite numerous flammable materials releasing hazardous pollutants which could then be transported by prevailing winds into Grass Valley and environs. The commenter does not identify these "flammable materials." As stated on page 4.13-20 of the DEIR:

The County Fire Marshall's Office has indicated that a comprehensive vegetation management plan will be necessary for the Centennial and Brunswick Industrial Sites. Once approved, the plan shall be adhered to, in perpetuity with the project. While the applicant has prepared an FPP to address, among other things, the long-term on-site management of fuels, initial construction activities and the use of heavy equipment on-site for vegetation removal could exacerbate wildfire risk. The vegetation management plan component shall be inclusive of both the Centennial and Brunswick Industrial Sites, as well as construction and operational activities, and be reviewed and approved by the Fire Marshall's Office. According to the local fire agencies, including CAL FIRE, whose primary responsibility it is to provide wildland fire suppression for both Sites, ongoing implementation of a vegetation management plan would reduce wildfire risk at the Sites to a less-than-significant level.<sup>9</sup>

Mitigation Measure 4.13-2 of the DEIR requires ongoing implementation of a Vegetation Management Plan for the project and would reduce the project's potential impact to a less than significant level.



### **Response to Comment Ind 634-77**

The commenter asks what pollutants may enter the creeks should there be a fire on one or both of the project sites; however, the commenter does not provide any details as to what pollutants would enter the creek should a fire occur at the project site. The future effects of a fire, location of such a fire, or equipment or materials involved is speculative. As stated in CEQA Guidelines Section 15384, “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.” As the impact of a fire is speculative, this impact need not be analyzed in an EIR. Nonetheless, the DEIR requires that the mine operator obtain coverage under the Industrial General Permit, prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). Implementation of the SWPPP will ensure that pollution from industrial activities on the site, pre- and post-fire, would not impact surface waters.

### **Response to Comment Ind 634-78**

The project truck traffic accounts for only approximately 1% of typical traffic on Brunswick Road and would not affect an evacuation. Please see Master Response 5 – Evacuation Zones. If an evacuation were taking place on Brunswick Road, the project’s trucks would be redirected along with other traffic on Brunswick Road or would be parked at either the Brunswick or Centennial sites. It is approximately 2.3 miles from the Brunswick site to Highway 49/20 along Brunswick Road, with an approximate 4-minute driving time. Therefore, it is only a short drive for the one or two project trucks to return to the site if requested to do so by local authorities.

### **Response to Comment Ind 634-79**

Brunswick Road is classified as a Minor Arterial Road in the Nevada County General Plan. See Table 4.1 of the Circulation Element. Minor Arterials are defined in the General Plan as roadways providing primary access from freeways and principal arterials to major origins and destinations (e.g., Brunswick Road and Donner Pass Road); <https://www.nevadacountyca.gov/DocumentCenter/View/12576/Chapter-4-Circulation-2010-PDF>

### **Response to Comment Ind 634-80**

The DEIR (page 4.12-89) analyzed loaded trucks on the downhill section of Brunswick Road, approaching the Loma Rica Drive signals during poor weather. This portion of Brunswick Road is already regularly used by heavy-duty haul trucks. As is currently the case, it is incumbent upon individual truck drivers to drive with caution during periods of inclement weather. Mitigation Measure 4.12-6(e) requires the applicant to install a sign just south of the crest of the grade, warning truck drivers of the transition in grade and presence of the downgrade Loma Rica Drive intersection.

### **Response to Comment Ind 634-81**

Truck traffic from the project would not interfere with the safe and efficient movement of people and goods. Please see Chapter 4.12 of the DEIR which discusses transportation and traffic issues.

### **Response to Comment Ind 634-82**

Two 12,000-gallon above ground diesel fuel tanks are proposed for the project as stated in the DEIR (e.g., Table 3-5, Table 3-9, page 4.13-24). The original application proposed a single large tank, but this was revised during the DEIR preparation.



### **Response to Comment Ind 634-83**

As stated in the Well Mitigation Plan (Appendix K.9), the applicant would pay for both the monthly fixed service charges and volumetric service charges. This reimbursement would be for the price of water incurred and would include any “drought surcharges” if NID billed such a surcharge to the property owner. A property owner would be subject to the same drought limitations imposed similar to any other NID customer.

The commenter states that the applicant should pay for water for any parcel connected to NID water supply for the life of the mine, even after the parcel is sold or annexed into the City of Grass Valley. The Well Mitigation Plan (Appendix K.9 of the DEIR) takes a conservative approach and presumes that an owner who decides to connect to the NID system has been impacted by and at the fault of the mining operation, even if no impact to groundwater well supply has occurred. As such, the Well Mitigation Plan was designed to be even more conservative than Nevada County General Plan Policy 17.12, which requires an impact as a prerequisite to the obligation to pay for water, which policy states “If it is determined that the operator is at fault, impacted owners shall be compensated by the operator.” A new homeowner would not be impacted because the impact would have previously occurred, and the cost of purchasing water from NID for that new homeowner would be the same as buying any other home connected to NID’s water supply. The provision of free water as a selling feature to a new buyer is not contemplated by the policy. If a property was annexed into the City of Grass Valley, it would be subject to the ordinances of the City, which allows water wells to only be used for irrigation purposes only (Grass Valley General Ordinance Section 13.16.020) and would therefore require a property owner to connect to the potable water supply and pay for their water use. As annexation of a home into the City would already require connection to NID water supply and purchase of NID water, continuation of payment for water by the applicant after annexation would be a windfall to the property owner rather than mitigation of an impact, and is not required by CEQA or County policy.

### **Response to Comment Ind 634-84**

The electricity use estimate includes 3 main ventilation fans, 2 booster ventilation fans, and 10 auxiliary ventilation fans. All fans would be located underground once the service shaft is constructed. There is only one emission source from the underground mine at the Brunswick shaft where mine ventilation air is exhausted. The ventilation fans distribute air throughout the mine workings and are not themselves emission sources in the HRA since the fans are powered by electricity, rather than diesel engines.

### **Response to Comment Ind 634-85**

The emergency generator emissions during a 24-hour power outage are shown in Table 4.3-25 on page 4.3-104 of the DEIR. Since the use of emergency generators is speculative and beyond the reasonable control of Rise Grass Valley, Inc., the emissions presented in Table 4.3-25 are for informational purposes only. Nonetheless, the Health Risk Assessment prepared for the DEIR assumed emergency generators operated for up to 100 hours per year, as stated on page 23 of the HRA (page 384 of Appendix E.1).

### **Response to Comment Ind 634-86**

As shown in Table 4.7-2 of the DEIR, insurance for explosives transport is regulated by 49 CFR 387, which specifies the minimum levels of financial responsibility for motor carriers.

### **Response to Comment Ind 634-87**

The timing of mining in areas above the 1000-foot level has not been estimated and will depend on exploration success, operational priorities and mining schedules. However, as shown on Sheet





15 of Appendix K.2, most of the known mineralization is greater than 1000 feet below ground surface (bgs).

### **Response to Comment Ind 634-88**

The commenter's concerns are addressed through Mitigation Measure 4.7-2(b) of the DEIR, which states:

4.7-2(b) *If unidentified or suspected contaminated soil or groundwater evidenced by stained soil, noxious odors, or other factors, is encountered during site improvements, work shall stop in the area of potential contamination, and the type and extent of contamination shall be identified by a Registered Environmental Assessor (REA) or qualified professional. The REA or qualified professional shall prepare a report that includes, but is not limited to, activities performed for the assessment, summary of anticipated contaminants and contaminant concentrations, relevant Environmental Screening Levels for identified contaminants, whether the contaminants exceed Environmental Screening Levels, thus warranting remediation, and recommendations for appropriate handling and disposal. Site improvement activities shall not recommence within the contaminated areas until any necessary remediation identified in the report is complete. The report and verification of proper remediation and disposal shall be submitted to the Nevada County Planning Department for review and approval.*

### **Response to Comment Ind 634-89**

A Hazardous Materials Business Plan (HMBP) has not been submitted and is not required to be submitted for the CEQA process. Mitigation Measure 4.7-1(c) requires the HMBP to be submitted and approved by the County prior to the use or storage of hazardous materials or explosives on-site.

### **Response to Comment Ind 634-90**

The mitigation fee for the Nevada County Local Traffic Mitigation Fee (LTMF) is calculated through the preparation of a nexus study that is updated every five years and approved by the Nevada County Board of Supervisors.

The various traffic improvement mitigation fees do not consider project-specific traffic routes. These fees are designed to pay for planned roadway improvements throughout the County based on priorities and budgets presented in the nexus studies prepared for each fee program.

In regards to Brunswick Road, Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road.

The Regional Transportation Mitigation Fee (RTMF) development impact fees are collected by the County and deposited into the account specific to the RTMF, to help fund construction of the regional system of roads, streets, and highways needed to accommodate growth in western Nevada County. These fees are "sufficient" to fund the project's impacts to projects that are included in the RTMF. However, the intersection at Brunswick Road / SR 174, is currently not



included in the RTMF and therefore the project's impact to this intersection has been found to be significant and unavoidable despite the requirement to pay the project's fair share to the improvement of this intersection under Mitigation Measure 4.12-1(c).

**Responses to Comments Ind 634-91 through Ind 634-107**

These comments are a duplicate copy of content in Group Letter 7. Please see Responses to Comments Grp 7-155 through Grp 7-197.



**Individual Letter 635**

**From:** [BOS Public Comment](#)  
**To:** [Matt Kelley](#); [Brian Foss](#); [Caleb Dardick](#)  
**Subject:** FW: MINE...and Yours  
**Date:** Tuesday, March 8, 2022 7:38:39 AM  
**Attachments:** [Mine- Sciences clear Mar. 6.rtf](#)

Dist 2

**From:** Pamela Kissler <pamkissler@att.net>  
**Sent:** Sunday, March 6, 2022 8:23 AM  
**To:** BOS Public Comment <BOS.PublicComment@co.nevada.ca.us>  
**Subject:** MINE...and Yours

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**Ind 635-1**

Dear Folks, who will be making a decision which will have tremendous impact on our health, our families' livelihood, our children's future, our environment and wildlife, our property value, and our overall quality of life...I don't envy you.

**Ind 635-2**

This decision regarding the opening of the Idaho-Maryland mine is monumental in it's potentially negative impact on so much we hold dear. I cannot personally see EVEN ONE redeeming benefit to re-opening the mine. After reading everything I can find about the situation for the past few months, and watching videos regarding the impact of previous re-openings, I believe we have nothing to gain and everything to lose by allowing Rise Gold to invade our home and cause such devastating damage to us.

**Ind 635-3**

Being the recipient of dishonest and misleading advertisements from Rise Gold, I imagine that they are not above Bribery to get what they want - Free access to our land without the need for due diligence, following the rules, keeping their empty promises, or having any regard for us or our land.

Thank you for listening to the many voices in Nevada County protesting this re-opening.

Sincerely,  
Pam Kissler



## **INDIVIDUAL LETTER 635: PAM KISSLER**

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### **Response to Comment Ind 635-1**

The comment does not address the adequacy of the DEIR, but expresses general concern regarding the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 635-2**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

### **Response to Comment Ind 635-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 636**

- Ind 636-1**
- SCIENCE IS CLEAR
- Science is clear but Rise Gold’s most recent mailing is anything but. Rather, it is an intentionally misleading attempt to skew the facts regarding the mine reopening.
- Has the mine reopening been approved?  
No, Nevada County has NOT just completed anything regarding approval of the mine reopening. The county Board of Supervisors has yet to conduct its first meeting to discuss the contents of the draft environmental study. They have not yet fully considered nor approved the contents of the study. No final determination has been made as to the accuracy of the scientific analysis, anticipated impacts, or adequacy of the proposed regulation of a reopened mine.
- The DEIR (DRAFT Environmental Impact Report) has not laid to rest anything. Rather, the report enumerates 83 impacts, 32 of which are considered significant enough that they will require some measure of intervention so as to make them not as bad as they actually are anticipated to be. Some impacts are so severe, there is nothing that can be done, we will just have to live with them. We are being asked to accept a lower quality of life in Grass Valley.
- Ind 636-2**
- None of these concerns have been “put to rest”. There remains grave concerns about drained wells, spoiled aquifers, polluted water ways, destroyed habitats, dust, exhaust, noise, and airborne chemicals associated with the transportation of waste and by gold extraction. There is no confirmation that there will not be spills, seepage, accidents, oversight, or callous disregard of regulations or safety practices.
- Ind 636-3**
- What is the DEIR?  
The DEIR’s only purpose is to lay out the ways in which the reopened mine will impact our environment and the possible ways some of these impacts could be dealt with. This report was compiled for and paid for by Rise Gold. It is important to note that this report was limited by and relied exclusively on information provided to the consulting firm by Rise Gold, and many of the conclusions reached in the report are based on assumptions and best case scenarios. The report does not guarantee in any way what will be the actual outcome. The fact remains, the mining industry is the single largest source of toxic waste and one of the most destructive industries in the country. Today’s industrial mining involves the blasting, deep excavating, and crushing of acres of land and the use of huge quantities of toxic chemicals such as cyanide and sulfuric acid.
- Ind 636-4**
- But what about the new jobs?  
Rise Gold states we can expect 612 new jobs, 312 of which are directly related to the mine





- operation. The other 300 are presumed to be increases in our current employment base, in response to the estimated 50 million new dollars being poured into our community. Two thirds of the 312 mine employees are to be current local residents. The remaining 104 employees, would be the top paid technical and managerial positions. Are any of these highly trained specialized employees already a part of our local community? Or will these positions more likely be outsourced? Will adding 104 new Grass Valley residents really induce a new local spending increase of \$50M each year?
- 
- Ind 636-5** Do mine workers really earn \$122,000 a year?  
When Rise Gold says “average”, they are including all salaries, including the top 1/3 salaried positions in the calculation of that average. This includes the CEO’s anticipated very generous salary. Furthermore, Rise Gold’s estimated worker earnings includes company-paid benefit costs that the employee never sees in their paycheck. The reality is an entry-level Miner can expect to earn an average total compensation (includes bonus and overtime pay) of \$18.55/hour, based on a survey of typical existing salaries. An early career Miner earns \$20.26, and an experienced Miner with 10-19 years of experience earns \$27.56. (source: payscale.com). Truck drivers, janitors, front load operators, security staff, etc. will all be making the current going rate, with or without a mine.
- 
- Ind 636-6** Do we get to keep the gold? No, we don’t. All of the gold and all of the profits will be leaving Grass Valley. The city of Grass Valley and Nevada County will not be receiving a piece of the gold pie. Any profits will go to the owners and shareholders of Rise Gold.
- 
- Ind 636-7** So what’s in it for us?  
That is a very good question. Grass Valley assumes all of the risks, and for what? It’s a case of trading the family cow for a handful of magic beans. We would be risking so much for so very little; throwing away our beautiful quiet community, our neighbors, our scenery, our streams and rivers, our air quality, our water quality and habitat, our well paved traffic free streets, our peace and quiet, and our tax dollars for mitigation and reparation—24/7 for the next 80 years; for what?  
  
Please let the Board of Supervisors know what you want for your community. email: BOS.PublicComment@co.nevada.ca.us



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## **INDIVIDUAL LETTER 636: PAM KISSLER**

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### **Response to Comment Ind 636-1**

The commenter expresses general concerns regarding the DEIR but does not identify specific issues. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

### **Response to Comment Ind 636-2**

For concerns regarding well impacts, please see Master Responses 14 and 15; for concerns regarding polluted waterways, please see Master Response 35; for concerns regarding habitat loss, please see Chapter 4.4, Biological Resources; for concerns related to dust and airborne chemicals, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; for concerns related to exhaust, please see the health risk assessment (DEIR Appendix E.1), the results of which are incorporated into Chapter 4.3; for concerns related to noise, please see Chapter 4.10, Noise and Vibration; and for concerns related to spills, please see Chapter 4.7, Hazards and Hazardous Materials.

### **Response to Comment Ind 636-3**

The DEIR evaluates the proposed project's consistency with applicable policies, regulations, and standards established at the federal, State, and local levels and incorporates analyses from the County's expert consultants, which includes independent third-party peer reviews of the technical reports provided by the applicant team. Where potential impacts are identified, the DEIR sets forth mitigation measures to reduce the severity level of the identified impacts to the extent feasible and discloses the level of impact that would occur subsequent to incorporation of mitigation. As such, the analysis within the DEIR is adequate and meets the requirements set forth by the CEQA Guidelines.

In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project. Because significant and unavoidable impacts have been identified in the DEIR, for which feasible mitigation measures cannot reduce the potential impact to a less-than-significant level, the County, should it decide to approve the proposed project, would be required to adopt a Statement of Overriding Considerations.

The commenter's generally noted concerns related to the proposed project are noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1.

### **Response to Comment Ind 636-4**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

### **Response to Comment Ind 636-5**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.



**Response to Comment Ind 636-6**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

**Response to Comment Ind 636-7**

The comment does not address the adequacy of the DEIR. Please see Response to Comment Ind 636-2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 637**

**From:** Pamela Biery <pamela@pamelab.com>  
**Sent:** Wednesday, March 23, 2022 9:30 AM  
**To:** Idaho MMEIR; Dan Miller; Heidi Hall; Ed Scofield; Hardy Bullock; susan.hoek@nevada.ca.us  
**Subject:** MMEIR Comments

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Dear Nevada County Planners and Board of Supervisors,

Please stop Rise Gold's Mine Idaho-Maryland mine proposal.

**Ind 637-1**

1. The re-opening of the Idaho-Maryland Mine would mean opening 360,000 gallons of toxic water which are now contained underground, possibly returning it to the local rivers and streams. No adequate plan is in place for the unquantified problems that may arise from this hazardous waste, which is now contained.

**Ind 637-2**

2. Having 24/7 heavy equipment moving the waste from one site to another on a route that passes 4 nursing homes and a hospital, as well as a planned commercial corridor.

**Ind 637-3**

3. Mining activity puts local homeowners at risk of losing water and immediately devalues their homes.

**Ind 637-4**

4. The company proposing the project is Canadian and is barred from mining in Canada currently due to ongoing litigation.

5. Grass Valley is on a pathway of supporting tourism and local business. This activity endangers millions in tourism income. This tourism income is local and benefits thousands of Nevada County residents.

These factors don't even account for the mine itself and other possible negative outcomes of ongoing operations.

**Ind 637-5**

Please follow Canada's example: do not let Rise Gold mine in Nevada County.

Sincerely,

Pamela Biery  
Grass Valley, CA

[PamelaB.com](http://PamelaB.com)  
[Thumblr.net](http://Thumblr.net)

530.218.2027 c



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## **INDIVIDUAL LETTER 637: PAMELA BIERY**

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### **Response to Comment Ind 637-1**

As discussed in Section 3.4.1.1 of Appendix K.2, the water in the mine contains only iron and manganese above state water quality guidelines. The proposed on-site water treatment plant has been designed to adequately treat iron and manganese to state standards. The water treatment plant will be permitted by the State prior to its approval and operation. For further detail, please see Mitigation Measure 4.8-1(a).

### **Response to Comment Ind 637-2**

The specific concern of the commenter is unclear. Nevertheless, the following response is offered. Health risks from diesel equipment, including haul trucks, is addressed in Chapter 4.3 of the DEIR. The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds.

### **Response to Comment Ind 637-3**

The comment does not directly address the adequacy of the DEIR. Property value is outside the scope of CEQA. For groundwater concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 637-4**

Please see Master Response 3 – Operator Responsibility.

### **Response to Comment Ind 637-5**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 638**

**From:** Pam Jung <pfjung65@gmail.com>  
**Sent:** Saturday, March 19, 2022 10:04 AM  
**To:** Idaho MMEIR  
**Cc:** Pam Jung  
**Subject:** The Mine

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Have you folks been paying attention to the comments in The Union? All against the mine (I think it might have been Jeff Kane who said a survey showed 80% at least say NO TO THE MINE ). In light of this what more will it take for the Planning Commission and Board of Supes to shoot down this project once and for all. It's been a stupendous waste of time, as it's been before when this issue has surfaced. Just say NO to reopening any mine now and in the future. We'll save ourselves time, energy and tempers.  
Pam Jung  
Grass Valley  
P.S. I've saved all the articles in The Union about this issue...so if anyone want me to wheelbarrow them into chambers, let me know.

**Ind 638-1**



## **INDIVIDUAL LETTER 638: PAMELA JUNG**

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### **Response to Comment Ind 638-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 639**

**From:** Pamela Whitman <pamwhitman@yahoo.com>  
**Sent:** Monday, April 4, 2022 10:57 AM  
**To:** Idaho MMEIR; Matt Kelley; bdofsupervisors  
**Subject:** Community input regarding Rise Gold Id-Md Mine DEIR

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To Matt Kelley, Senior Planner, the Planning Commission and Nevada County Board of Supervisors,

I have been a resident of Grass Valley for almost 24 years and love and appreciate the rural quality of our environment. We live off of You Bet Rd, near Hwy 174, and use Brunswick Rd as our main route to town. I have been working to grasp the big picture of the potential impact of the Rise Gold Mine on our community and want to share with you some thoughts based on my research.

**Ind 639-1**

I have reviewed the DEIR for Rise Gold's proposed reopening of Idaho-Maryland Mine. The fact of 83 negative impacts to our small rural community, only 32 of which have proposed mitigation, is unacceptable in itself, but the 'significant and unavoidable impacts' are enough to stop this project in its tracks now! We also have to keep in mind that this report was paid for by the mining operation and was based on their information, so it in no way can be presumed to be the final word nor represent the complete picture. Their claim that "The Science is Clear" is in itself not scientific! As a graduate of MIT with a background in science (and humanities), I take issue with such cavalier use of the term 'science.' This should raise a red flag for us from the start.

**Ind 639-2**

In particular, with regard to Aesthetics (4.1-2), there would be substantial damage to scenic resources and conflicts with several applicable zoning requirements (including building height limits, steepness of slopes, required set-backs, etc.). Section 4.1-4 lists cumulative long-term changes to the visual character of our community. If this operation were in the middle of a desert, instead of in the middle of our community, these issues might not be so pressing, but given our situation, this already makes it a non-starter. This would forever be 'the elephant in the room' that we would have to live around.

**Ind 639-3**

Traffic (4.12-1) would be significantly impacted on Brunswick Rd, a major road (not a 'minor arterial') in our community that I frequently use. Adding 100 roundtrips of trucks per day would totally change the character of this area. As stated above, inserting a major industrial operation in the midst of our rural town is inconsistent with the nature of our community.

**Ind 639-4**


Noise levels (4.10) have already proven to be unacceptable during the exploratory drilling. Despite whatever levels may be officially deemed 'acceptable,' they are not acceptable to the community. When this is put in the perspective of a 24/7 operation over 80 years, there can be no justification or benefit to the community to warrant this forfeiture of our basic right to peace and quiet. It is interesting to recall the story that most of us probably have heard, how the owners of Empire Mine only stopped their 24hr a day operation of the stamp mills for a period of 24 hours when their daughter got married on the grounds. This isn't the life we want to return to. This is our past, not our future. The toxic waste





- ↑
- from Empire Mine is still being dealt with, and there are areas where it is cordoned off, since it is still not safe to walk there.
- Ind 639-5** Given the challenges of climate change and the historic drought conditions in California, perhaps the most daunting question relates to water. The Hydrology report relied on very limited data, not taking into account outflow rates that were higher than reported and operating on the faulty assumption that there is no seasonal variation in groundwater levels. Over 300 wells could be immediately impacted, with the possibility of many more. Water is our most precious resource—*more so than gold!* We can't afford to squander it, threatening groundwater as well as creeks, aquifers and habitats. We can see how the failed San Juan Mine permanently damaged wells in the 1990's. Since the mineral rights extend over 2500 acres from 200' below the surface, there is no guarantee that wells throughout our area (over 1800 properties) might not also be affected. No matter how beautiful our home, without water it loses all value.
- Ind 639-6** Our air quality is already often poor. We shouldn't even be considering a project that has the potential to add even more toxic pollution from various sources. It would also create even more greenhouse gases (estimated at 13 metric tons/yr) that would completely undo our County Environmental Action Plan.
- Ind 639-7** Power consumption is projected to be 12% of the current NC usage, the equivalent of adding 5000 new homes to our area! We already struggle with power outages, and the increase use of fossil fuels would offset our plan to combat climate change.
- Ind 639-8** Despite their slick advertisements, we are not fooled. Rise Gold offers little to our community but asks so much from us. Mining creates the fewest jobs of any industry, especially downstream in the local community. If they get approval for this project and fail (as is in their history!), they could pull out and sell the rights to another company. In the past, they reportedly failed to report leakages of toxic material (<https://s3.documentcloud.org/documents/3539874/Banks-Island-Gold-Charges-March-2017.pdf>), or to clean up the site. See also <https://www.canlii.org/en/bc/bcca/doc/2020/2020bcca299/2020bcca299.html?searchUrlHash=AAAQASimJlbmphbWlulG1vc3NtYW4iAAAAAAE&resultIndex=1> and <https://www.bccourts.ca/jdb-txt/sc/20/01/2020BCSC0167.htm>. We don't want to risk being left in this situation here. Rise Gold has demonstrated it is not a good-faith partner for a business that would transform our community in so many negative ways.
- Ind 639-9** To me, the big picture is: This is a toxic business that poses significant and unavoidable risks to our community. It creates many unmitigated impacts that we would be expected to bear. We are being asked to carry the risk, lower our standards, bend the rules, renege on our climate change efforts, forfeit the character of our community and the quality of our environment—but for what? Money from the endeavor would not stay here—and no amount of money could bring back what was lost in the process. Home values would inevitably drop, so we would actually lose revenue.
- Ind 639-10** How can our Planning Commission confidently make recommendations—and our Board of Supervisors make decisions— that will negatively affect literally every aspect of our community life 24/7 for the next 80 years? I urge you to reject this proposal, as it is inconsistent with our needs, values and the future we would like to create.
- Thank you for your thoughtful consideration,  
Pamela Whitman
- ↓



 Pamela T. Whitman, M.A.  
Painting Therapist  
Teacher of Light, Color and Darkness





## **INDIVIDUAL LETTER 639: PAMELA WHITMAN**

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### **Response to Comment Ind 639-1**

The commenter states that the many impacts listed in the DEIR should be grounds to disapprove the project. The commenter also appears to suggest that the DEIR is biased because it was paid for by the Project Applicant and based on their information. The CEQA Guidelines allow a Project Applicant to prepare a DEIR as long as the lead agency, in this case Nevada County, independently reviews the DEIR. (14 CCR 10584(d)(3); (e).) Not only did the County independently peer review the information provided by the applicant, but the County hired Raney Planning and Management to prepare the DEIR. The commenter's opposition to the project is noted for decision makers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Responses to specific comments are provided below.

### **Response to Comment Ind 639-2**

The commenter is concerned about the project's adverse impacts to aesthetics. As stated on page 4.1-22 of the DEIR, the project would substantially degrade the existing visual character or quality of public views of the project sites or the site surroundings. Implementation of Mitigation Measure 4.1-2 would reduce the significant impact by requiring more dense plantings along the project frontages to screen project structures to the maximum extent feasible. However, given the proposed heights of the structures and the permanent alteration of the views, the impact would remain significant and unavoidable. As stated on page 4.1-29, long-term changes in visual character associated with the project in combination with cumulative development, is cumulatively considerable and significant and unavoidable.

### **Response to Comment Ind 639-3**

The commenter states that Brunswick Road would be significantly impacted by project-generated traffic and that Brunswick Road is a major road, not a "minor arterial." The DEIR identifies Brunswick Road as a minor arterial road. (DEIR, p. 4.13-15.) The commenter also states the project is inconsistent with the surrounding community. As stated on page 4.13-15 of the DEIR, according to the Table 4.1 of the Circulation Element of the Nevada County General Plan, Brunswick Road is considered a Minor Arterial. The DEIR found that all traffic-related impacts of the project would be less than significant after mitigation, with the exception of the impact to the intersection at Brunswick Road and State Route 174 (LOS impact) and Brunswick Road and Sutton Way (queueing impact), which would be significant and unavoidable. Regarding the project's consistency with the surrounding community, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 639-4**

The DEIR appropriately focuses solely on the impacts of the Idaho-Maryland Mine Project and not prior exploratory drilling. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The commenter states that the project's noise-related impacts are unacceptable. The DEIR found that the installation of the potable water pipeline would produce a temporary significant and unavoidable impact. (DEIR, p. 4.10-30.) For all other noise-related impacts, the DEIR found that the project impacts would be less than significant, in some cases after implementation of mitigation measures identified in the DEIR. (DEIR, p. 4.10-31, 37, 59.) Lastly, the commenter states that a prior operator of the mine utilized stamp mills and produced toxic waste. The project does not propose to use stamp mills and the scope of the DEIR does not address actions by prior operators of the Idaho-Maryland Mine. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.



### **Response to Comment Ind 639-5**

The commenter states that the DEIR's analysis of groundwater impacts is based on limited data and faulty assumptions, and that the DEIR underestimates the number of potentially impacted groundwater wells. The commenter also implies that the Project Applicant could expand operations within the mineral rights boundary and affect more groundwater wells. The commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

### **Response to Comment Ind 639-6**

The commenter is concerned that the project would adversely impact air quality. The commenter is referred to Master Response 18 - Air Quality Thresholds, Master Response 25 - Nevada County Energy Action Plan, and Master Response 27 - Greenhouse Gas Thresholds.

### **Response to Comment Ind 639-7**

The commenter is concerned about the project's energy consumption. The commenter is referred to Master Response 25 - Nevada County Energy Action Plan, and Master Response 27 - Greenhouse Gas Thresholds. As stated on page 4.11-35 of the DEIR, PG&E provided a will serve letter for the project and has confirmed that there are electric facilities available to serve the project in accordance with all applicable design standards, rules, and tariffs on file with the State of California Public Utilities Commission.

### **Response to Comment Ind 639-8**

The commenter states that jobs produced by the project would be of little value to the community and that the Project Applicant is not trustworthy based on past mining projects. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 639-9**

The commenter is generally opposed to the project but does not discuss specific inadequacies with the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 639-10**

The commenter urges the County to not approve the project. The commenter's opposition to the project is noted for decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.



**Individual Letter 640**

**From:** pat henderson <hendersonpat181@gmail.com>  
**Sent:** Thursday, March 31, 2022 12:29 AM  
**To:** Idaho MMEIR  
**Subject:** mine

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**Ind 640-1**

I doubt that you, the Board of Supervisors will live another eighty years to witness the complete devastation of our beautiful community if you vote to reopen the mine. It is very evident that an overwhelming majority of the people do not want this to happen. Please vote in favor of the people! I personally would like the people to vote and not the Board of Supervisors. The Board has the power to make this change and you should consider doing it. It really is the right thing to do for such a serious matter.

Pat Henderson  
Grass Valley



## **INDIVIDUAL LETTER 640: PAT HENDERSON**

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### **Response to Comment Ind 640-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 641**

**From:** [rabby](#)  
**To:** [Idaho MMEIB](#)  
**Subject:** well  
**Date:** Saturday, February 12, 2022 2:10:32 PM

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**Ind 641-1**

I own property quite near the Idaho Maryland Mine and am STRONGLY oppose to the reopening for a myriad of reasons, not the least of which is my water supply. I have already been negatively affected by the purposed project. During the exploratory drilling the deeded spring, which has served 4 homes for 90 years, went dry. My neighbors and myself had to scramble to drill wells at considerable personal cost. Of course there is no proof that the drilling is what caused the spring to go dry, but it happened co-incidentally with the action, and pursuing legal action is cost prohibitive. Although Rise Gold says they will supply water through NID if wells go dry. Are they planning on paying the monthly costs? I think not!

There's also issues with noise, traffic on small roads and infrastructure, and housing for personnel. I feel it's a bad idea all around.

Please DO NOT give them a permit

Thank you, tax payer Patricia Bennett 11273 Lava Rock Ave. Grass Valley CA 530-366-5615





## **INDIVIDUAL LETTER 641: PATRICIA BENNETT**

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### **Response to Comment Ind 641-1**

For the commenter's well concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 642**

**From:** Patrick Johnson <patrickpuppet@gmail.com>  
**Sent:** Saturday, April 2, 2022 8:03 PM  
**To:** Idaho MMEIR; DEIRcomments@cea-nc.org  
**Subject:** DEIR woefully inadequate and overly optimistic

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Nevada County Planning Commission,

**Ind 642-1**

After reviewing the DEIR, I find it to be woefully inadequate and overly optimistic. The document underestimates the negative impacts that reopening the Idaho-Maryland Mine will have on our environment by not satisfactorily addressing the impacts that the mine will have on our air, water and soil quality—not to mention the mine's contribution to noise pollution.

Gold mining is a proud part of Grass Valley's history and heritage. However, one of the sad and enduring legacies of the local gold mining industry is environmental ruin. When mines operated for 24 hours a day, streams were polluted with waste-water runoff, forests were cleared for lumber, the air was blackened by the operation of industrial machines, and the deafening pounding of stamp mills could be heard for miles around.

**Ind 642-2**

The DEIR has not convinced me that the Idaho-Maryland mine will not have a negative impact on our local environment.

Once Rise Gold Corp has extracted all the riches from the Idaho-Maryland Mine, they will pack up their carpetbags, head back to Canada, and leave our children and grandchildren with an environment in ruin. In this age of drought and wildfire, let's not add the consequences of mining to the list of environmental disasters that plague this region.

Thank you,  
Patrick Johnson  
Grass Valley resident



## **INDIVIDUAL LETTER 642: PATRICK JOHNSON**

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### **Response to Comment Ind 642-1**

The commenter states that the DEIR is woefully inadequate but does not provide any specific evidence to support this claim, other than it does not satisfactorily address mine impacts to air, water, and soil quality, as well as noise. As discussed in Master Response 1, such general statements do not warrant specific responses under CEQA Guidelines. Please see the respective chapters of the DEIR for such concerns (4.3, 4.8, 4.7, 4.10).

### **Response to Comment Ind 642-2**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Responses 1 through 3, and 16. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 643

**I support re-opening the Idaho-Maryland Mine**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. Urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Patti Grijalva  
Address 12915 Lost LAKE RD, GV NEVADA COUNTY 95945  
Phone 530-263-7827  
Email Address grijalva4000@yahoo.com

Dist 1

Ind 643-1

NO MINE!  
DO NOT SUPPORT THIS  
RECEIVED  
FEB 22 2022



## **INDIVIDUAL LETTER 643: PATTI GRIJALVA**

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### **Response to Comment Ind 643-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 644**

**Ind 644-1**

I am writing in opposition to the reopening of the mine by Rise Gold and their mother company.

Other than the obvious issues of excessive truck traffic laden with hazardous materials taken to be piled into mountains in the Brunswick area, and the need to widen Brunswick and E. Bennett streets to accommodate the traffic, with the added noise of diesel trucks and equipment pumping excessive exhaust pollution into the air near residential areas – there is the problem of water.

**Ind 644-2**

Rise gold and affiliates will have to pump millions of gallons of water out of the shafts to clean in order to operate. This water, they contend, will be clean ‘enough’ to dispose of into Wolf creek where it will be used by home owners, businesses, farms and ranches for drinking, cooking, irrigation and bathing our babies. If this water is as safe as they suggest, then why is it not recycled for their own use as opposed to rapping the needed water from our community. They want millions of gallons from us every day instead of recycling what they already have. We have been in a drought for many years. Commercial businesses in town and residents should be our priority over a corporation that boasts that they will be a boon to our community. That is a bare-face lie. As a commercial building owner on Mill St. I am very concerned over the longevity of our prosperous communities.

**Ind 644-3**

The Idaho-Maryland mine closed in the mid 50’s when 174 was still a dirt road with 49 a winding two-lane road. Population of Grass Valley was 2500 people with lake Olympia in Brunswick. Since then, the towns have grown up around it. It became a lumber mill for a great many years, with a mill also on E. Bennett. Brunswick basin grew into a commercial hub, Cedar Ridge enlarged along with Peardale, and then there is Whispering Pines adding to the commercial businesses. The former mine is now a small space locked inside a thriving community that has miles of shafts and tunnels beneath the surface that will certainly impact all with its fingers.

**Ind 644-4**

Perhaps 80 years of sucking us dry of Rise Gold and their affiliates enriching themselves at our expense is worth it? Roadway congested, vibrations from detonations, property values plummeting, wells drying up, businesses failing – reduction of our quality of life.

In the 1800’s, ghost towns have occurred when mines have dried up. Grass Valley and Nevada City have blossomed when the mine closed. Let’s not turn us into a ghost town by reopening it.

Paul D Crovo  
125 Mill St  
13187 N Meadow View Dr



## **INDIVIDUAL LETTER 644: PAUL CROVO**

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### **Response to Comment Ind 644-1**

The commenter's statement about the need to widen Brunswick Road and E. Bennet Road is not supported by the roadway segment analysis in the DEIR, which determined that widening is not required to accommodate project traffic (see Table 4.12-13 of the DEIR). Regarding transport of toxic waste, the commenter is referred to Master Response 8 – Mine Waste Characterization.

### **Response to Comment Ind 644-2**

Please see Master Response 35 – Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 644-3**

The comment does not address the adequacy of the DEIR. Please see Master Response 1.

### **Response to Comment Ind 644-4**

The comment does not directly address the adequacy of the DEIR. For general concerns related to vibration, please see Chapter 4.10, Noise and Vibration; for general concerns regarding well impacts, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Property value and quality of life concerns are outside the scope of CEQA – please see Master Responses 1 and 2.



Individual Letter 645

March 31, 2022



Paul B Elias  
12125 Crystal Spr Rd.  
Grass Valley, CA 95945

County of Nevada - Planning Dept.  
950 Nevada Ave. Ste 170  
PO Box 599002  
Nevada City, CA 95959

Subject: Definitions Correction - They Make a Difference  
to Idaho Maryland Mine Project EIR Draft

Dear Planning Dept. -

Please make the correction where noted in referenced draft EIR that the Nevada County Lewis Rice Airport is not a SMALL Craft Airport! Perhaps that's a definition used at one time and in the out-of-date County general plan but <sup>not</sup> correct definition in the EIR ~~matter~~ draft.

The FAA has no reference to "Small Craft Airport" as stated in the mine's draft EIR. According to the FAA's airport definitions as easily found on their webpage, the Lewis Rice Airport is defined as: General Aviation Airport - Basic. Please make note + correct within the draft.

Best Regards,  Paul B Elias

Ind 645-1



## **INDIVIDUAL LETTER 645: PAUL ELMS**

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### **Response to Comment Ind 645-1**

Please see Response to Comment Ind 664-2.



**Individual Letter 646**

**From:** [Jane McGrew](#)  
**To:** [hcbosupervisors](#)  
**Subject:** Please reject the proposal from Rise Gold  
**Date:** Wednesday, March 23, 2022 4:17:13 PM

Dist 1

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**Ind 646-1**

Dear board of supervisors,  
As a physician, I am opposed to anything that could pose a risk to the health and wellbeing of our community.  
I realize that documents have been submitted that seem to suggest reopening the Idaho Maryland Mine would only be beneficial, this is simplistic reasoning motivated by the hope of profit.  
Risking harm to our way of life and health by this huge industrial undertaking is not worth possible damage to our air and water quality or the tranquility we so enjoy.  
Let future generations thank us for our good stewardship of our natural treasures instead of cursing us for being greedy.

Sincerely,

Paul G. McGrew  
12481 Hillcrest Dr.  
N.C., 95959





## **INDIVIDUAL LETTER 646: PAUL MCGREW**

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### **Response to Comment Ind 646-1**

The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds.

Regarding water quality concerns, please see Chapter 4.8, Hydrology and Water Quality. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 647**

Matt Kelley, Senior Planner  
950 Maidu Ave, Suite 170  
Nevada City, CA 95959

April 2, 2022

**Ind 647-1**

Table 2-1 Summary of Impacts and Mitigation Measures lists the concern:  
4.3-4 Result in the inefficient or wasteful use of energy. This concern is addressed as mitigation measure -- none needed. How can this be?

Rise's own estimates of the amount of power and particularly electrical power is huge and undermines/conflicts with the State and County energy reduction plans. The ways that Rise suggests that energy can be conserved and not wasted is to mostly ride on the coattails of PG&E and other providers who are actively working to develop and use alternative sources such as solar, electrical, wind, and/or biomass. (section 4.3-4 pdf page 379) Rise's plan to not be *inefficient or wasteful* is to use massive amounts of electrical energy that is partly generated by these "green" sources.

Sadly, Rise projected use of electricity for a one-year construction period is 16,513,00 kWh (pdf 394). This wipes out the Nevada County effort that conserved 13,034,571 kWh in 10 years ending in 2019. The county plans to reduce energy demands won't be attained and instead because of Rise, usage will increase significantly.

Rise did find some very small ways to reduce the amount of energy, but it is less than significant compared to the amount they will use. The main strategy was to buy their way out with carbon offsets that doesn't deal with the huge increased need for electricity and the draw on the grid in this area.

Rise misses possible ways that align with the county energy plans. Looking at Table 4.3-22 Project Consistency with Nevada County Energy Action Plan Energy Reduction Measures; Goal 2; Renewable Energy – Expand the Utilization of Renewable Energy and Resilience Measures (4.3-89-90).

**Ind 647-2**

The county goal Strategy 2.1: Prepare for the inclusion of renewable energy systems in new construction and large retrofit projects in-order-to meet California Zero Net Energy Goals by providing informational material when available.

Project's role: Pertains to solar photovoltaic systems in all residential construction and large retrofit projects. County to implement the provision of informational materials.

Not applicable to the project because the project consists of mining activity and industrial type development.

Why can't an industrial project that is constructing new buildings include renewable energy systems? Why does this type of construction with large buildings with large roof surfaces be used for to generate some solar power? What is missing in the DEIR is what ELSE Rise will do to



reduce its dependence on electricity. Rise isn't planning on installing solar panels on its steep sided hills, none are planned on the roof tops of the big buildings, parking won't be covered by roof top solar panels either (think Briar Patch).

The mining operations consume massive amounts of electrical energy. The data from the DEIR is briefly compared in the chart below.

For the purpose of comparison, the mWh unit (MegaWatt hours = 1000 kWh) used in the DEIR is converted to kWh (kilowatt hours)

Phase	mWh units annually	kWh annually	Total kWh
Construction - 1 yr	16,513	16,513,000	16,513,000
Operations –79 yrs	49,613	49,613,000	3,919,427,000
		Grand Total	3,935,940,000

Source: page 4.3-88)

The County's Energy Action plan for unincorporated areas of the county (<https://www.mynevadacounty.com/DocumentCenter/View/35183/Nevada-County-Energy-Action-Plan>) from 2017 cited a combined usage of 344,045,975 kWh for residential, non-residential and combined county agencies. Rise would use more than 10 times as much electricity as the rest of the unincorporated county in one year. A letter to the Union dated July 2, 2021 compares the mine's energy use to adding 5,500 homes to the community. This huge demand conflicts with the EAP goal for 2035 of reducing the demand for electricity by 51% which is an energy savings of 202,936,611 kWh (pre-Rise additions).

Ind 647-3

**Table 4.3-23** is the Annual Estimated Green House Gas Emissions that PG&E supplied electricity generates given in Metric Tons (MT)

Years	CO <sub>2</sub>	CO <sub>2</sub> e Gases equivalent to CO <sub>2</sub>
2021-construction/dewatering	1527.82 MT	1542.97 MT
2022-2032	4590.43 MT	4635.82 MT
2027-2032	4590.43 MT	4635.82 MT
2033-2102	4590.43 MT	4635.82 MT

This chart shows that indirectly the use of electricity isn't as "Green" as we'd like to think. It adds a significant amount of pollution / greenhouse gases into the atmosphere. It's not being generated at the mine but it is being produced for the mine. The mine DEIR doesn't include any mitigation that deal with the increase in pollution and its cumulative effect of GHGs from the electricity it will consume.



To review:

- The massive amounts of electrical energy required for mining operations is in conflict with the County's Energy Plan and energy reduction/conservation goal.
- The Mine's consumption will stress the capabilities of the electrical grid and cause large increases in pollution.
- The range of mitigations proposed are few and inadequate to address the reducing the use of "traditionally generated" electricity.

Respectfully,

Paul McMillan

Greenhorn Rd, Grass Valley



## **INDIVIDUAL LETTER 647: PAUL MCMILLAN**

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### **Response to Comment Ind 647-1**

The commenter states that the project's energy consumption is wasteful and conflicts with State and/or County energy reduction plans. As stated on page 4.3-102 of the DEIR, implementation of the project in combination with other cumulative development would not result in the wasteful or inefficient use of energy. Please also see Response to Comment Agcy 8-17. Because the project would not conflict with a local plan to increase energy efficiency and reduce energy consumption, a less-than-significant impact would occur. The commenter is also referred to Master Response 25 – Nevada County Energy Action Plan.

### **Response to Comment Ind 647-2**

The commenter questions why solar energy was not proposed to mitigate energy consumption of the project and points to the Nevada County Energy Action Plan (EAP) reduction goals. Compliance of the project with EAP strategies has been analyzed in Table 4.3-22 in the DEIR and was determined to be consistent with the EAP. The commenter is also referred to Master Response 25 - Nevada County Energy Action Plan. Regarding a solar energy system, while solar panels are not currently proposed as part of the project, the roof space of the project buildings may be available in the future for installation of solar panels to reduce the project's reliance on the energy grid. However, any such solar power generation would be small in comparison to the requirements of the project. Notably, the GHG emissions presented in the DEIR are conservative, since California regulations will reduce GHG emissions overtime. For instance, Senate Bill 100 requires that zero carbon energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis.

### **Response to Comment Ind 647-3**

This comment reiterates concerns regarding the project's energy consumption. The commenter is referred to Response to Comment Ind 647-2.

The project's air emissions and GHGs emissions are analyzed in Chapter 4.3 of the DEIR and are less than significant after mitigation. The commenter is also referred to Master Response 27 - Greenhouse Gas Thresholds.

As discussed on page 4.11-34 of the DEIR, the electrical grid system in the project area is well developed. A commercial sawmill that previously operated on the Brunswick Industrial Site was serviced by a dedicated 12kV PG&E power line. A high voltage power line also runs through the property west of the Brunswick shaft. Electricity for the project would be supplied by the existing 12kV PG&E line along Brunswick Road. The BRUNSWICK 1102 Circuit (Circuit), which would serve the project, has a rating of 13.26 MW. The project's total connected load is estimated at approximately 10 MW, with a net load of approximately 6 MW. As of the year 2021, the Circuit operates at 5.15 MW, or approximately 39 percent of the Circuit's maximum capacity. Based on PG&E's usage projections, the Circuit load is anticipated to drop to approximately 4.74 MW by the year 2025. Considering the project would generate an electric load of approximately 6 MW, and the Circuit currently provides 5.15 MW, the Circuit capacity would increase to 11.15 MW following implementation of the project. The increase in wattage associated with implementation of the project would remain within the Circuit's capacity of 13.26 MW and, thus, the Circuit would have available load capacity to accommodate the project.





**Individual Letter 648**

3-13-2022

To: Matt Kelley, Senior Planner, Nevada County Planning Department

950 Maidu Avenue Suite 170, Nevada City CA 95959-7902

[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

From: Paul S. Schwartz

13812 Meadow Drive, Grass Valley CA 95945

[psschwartz21@gmail.com](mailto:psschwartz21@gmail.com)

**Attention: Nevada County Planning Department, Nevada County Planning Commission and Board of Supervisors**

Comments on the DEIR for the Proposal to Reopen the Idaho Maryland Mine

**Ind 648-1**

1. 4.10-1, 2, 3- From one section of the Noise and Vibration report (Pg 4-10-45) "It is conservatively concluded that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or standards of other agencies, and the project's noise impacts could be significant." Seriously consider the setting and context as well. We are a rural community where noise levels are low in contrast to the constant background noise of traffic and urban activity in other cities and counties. Protecting and preserving the quality of our noise landscape is the right thing to do. The property is not currently zoned for heavy industrial mining operations. This is a General Plan designation made with community support and reflecting both community values, environmental integrity, and economic forethought.

**Ind 648-2**

2. The technical Reports reveal the energy requirements and the carbon footprint of the proposed Idaho Maryland Mine (IMM) enterprise are in conflict with the General Plan Energy Action Plan. The mine will require an energy increase equivalent to 12% of the current Nevada County energy load. In addition, it will require doubling the amount of energy currently used by the entire Nevada County commercial energy use. The document discounts the standing and relevancy of the Nevada County Energy Action Plan. Although implementation of the plan is in its infancy, the intent and goals are very clear. A project seeking an 80-year operating permit needs to fully address consistency with those goals and intent. At a minimum, a mitigation requiring an energy efficiency and carbon reduction plans revealing how Rise Gold intends to operate in the spirit of the Energy Action Plan.

**Ind 648-3**

3. The entire analysis of impacts to natural underground water systems lacks the data and analysis to accurately describe potential impacts to existing and future wells in the surrounding residential community. Changes in the natural underground water system resulting from massive dewatering need to be fully and accurately investigated. Projections need to be evaluated against industry know outcomes in similar mining operations to reveal the accuracy of these types of analysis. Similar gold mining enterprise in our county have dried and contaminated wells during the dewatering process. This is difficult to provide ongoing oversight without a clear long term funded plan for the 80-year permit. A plan that includes clearly defined oversight and periodic review and reporting. The plan should include methods, means, and clearly designated roles and responsibilities to monitor and mitigate conditions and damages to underground water sources for this part of the community. For instance, what are the first conclusive indicators of impacts to the natural underground water supply and what is



	<p>the action plan? Rise Gold needs to be required to provide a comprehensive plan and allow time for a peer review process to insure we understand the risks, indicators, and responses.</p>
<b>Ind 648-4</b>	<p>4. The DEIR fails to clearly outline strategy to mitigate dust and particulant pollution from the rock processing and transporting. Because of the risk associated with asbestos and other airborne hazards, manual wetting with water trucks and hoses is not good enough. A mitigation that describes an automated mechanical solution the trucks must go through and be washed and watered down before leaving the IMM or Centennial property is needed. In addition, for the rock processing, piling, and truck loading process, a system of overhead sprinklers or similar is needed to insure a constant level of quality throughout the enterprise. The DEIR must describe a mitigation plan that is more robust than providing on site water trucks and gravel pits for the trucks to drive through.</p>
<b>Ind 648-5</b>	<p>5. Policy related to view sheds, aesthetics, and community character in the General Plan are ignored. An example is the description of Brunswick Road as a minor arterial ignores the fact it is an entryway into the Brunswick basin and Nevada City. As an entryway it will continue to grow in importance and traffic volume. It represents for many guests to our community the first impression they will have and should not be dismissed because it does not have a scenic designation. We all know the cliché about how difficult it is to alter first impressions. A large part of our economy is derived from tourism, recreation activities, and the Arts. Protecting how we are perceived is critical to our long-term economic success. Over time the section of Highway 174 through Cedar Ridge into Grass Valley will see traffic levels flatten and Brunswick Road will become busier and busier. Caltrans investments and improvements to Highway 174 clearly show the importance of this route into our community and Brunswick Road should be recognized and protected from development that impacts its future success as an entryway and major arterial. This section of the traffic analysis and aesthetics impacts needs to be re-evaluated and reworked.</p>
<b>Ind 648-6</b>	<p>6. The DEIR analysis in each section is poorly organized and fails to describe or explain how proposed mitigation measures would reduce impacts to acceptable levels. The cumulative effect to our community of the negative impacts is poorly analyzed, dismissed, and ignored. Chapter 2, 2.5 Areas of Known Controversy includes 23 bullets to describe the breadth of the negative impacts the project carries with it. Mitigation Measures must be clear, feasible, and achievable. They must show how we can measure and determine the proposed mitigated outcome.</p>
<b>Ind 648-7</b>	<p>7. 3.0- "New underground workings would be below 500 feet from ground surface." What about existing workings that are less than 500 feet from the surface? Will these be properly filled and no longer used?</p>
<b>Ind 648-8</b>	<p>8. 4.1-1 "Have a substantial adverse effect on scenic vista" The analysis dismisses the height and massive rock infill that would be several stories high in the current IMM valley and rising above Brunswick Road. In addition to that are the multi-story buildings that require variances because they are more than double the acceptable height of buildings as defined in our General Plan and County regulation. How is this Less than Significant (LS) and how does Not Applicable answer to this Negative Impact? The next item in the table outlines a generic landscape plan that is proposed as a solution. This might be OK for a bank or a Wendy's, but it does not respond to the massive change to the viewshed or the extremely tall buildings.</p>
<b>Ind 648-9</b>	<p>9. 4.1-3 "Create a new source of substantial light and glare which would adversely affect day or night time views in the area." The DEIR designates this LS and mitigations as NA. Regardless of previous industrial activity at this location, decades have passed since their departure and the area is now predominantly residential. Introducing "substantial" new light and glare into the setting and dismissing the impact is unacceptable.</p>





**Ind 648-10**

10. 4.3-1 Traffic controls on Highway 174 improvements resulted in 20-30 minutes waiting for the pilot vehicle. If you lived within the project area, one trip could add one hour to your travel time. There needs to be a specific traffic management plan that puts more on the contractor and impacts the traffic flow more efficiently for drivers. Scheduling construction delivery and future trucking to off hours is a good idea. What are the off hours and how is this enforced? The Construction Exhaust Minimization Plan needs to be revealed now as part of the DEIR or specific performance and enforcement standards brought forward. Elements of the plan should not be allowed to be ignored because its inconvenient, costly, or outside the critical path. The project must meet the Federal 8-hours ozone Standard and employ all feasible NOX mitigations to achieve satisfy NSAQMD thresholds. This needs to be spelled out in the EIR.

**Ind 648-11**

11. 4.3-2 The proposed Asbestos Dust Mitigation Plan should be detailed in the DEIR. This is a large part of the negative impacts the project will have on the neighborhood and the community. The generalized statements offered as mitigation measures are insufficient and potentially ineffective. Previous NSAQMD requirements for similar projects included paving in work areas and automated watering systems as opposed to water trucks and gravel drive through pits. The mitigation should include automated wheel washing technology for all vehicles operating on unpaved surfaces. A spray misting system may be required to subdue harmful dust from project operations. The EIR should describe and include as a mitigation available technology that removes harmful fibers from air exiting the mine. In addition, description of an asbestos monitoring program should be part of the EIR and subject to NSAQMD review.

**Ind 648-12**

12. I am concerned about adding significant flows to South Fork Wolf Creek. I was a Wolf Creek Alliance stream care volunteer and adding millions of gallons a day would increase erosion and downstream sedimentation. It would challenge wildlife populations that live in the stream zones. Determining the impacts are less than significant (LS) and mitigations are not needed (NA) is foolishness. Plans for special status species, wetland protections, erosion controls, culvert replacement and monitoring program needs to be spelled out in the EIR.

**Ind 648-13**

13. Given everything we know about Rise Gold's senior leadership and their history in British Columbia, what protections do we have that they will honor agreements and perform professionally. Does Nevada County government have the capacity to inspect, police, enforce, litigate, and control Rise Gold's performance? This maybe outside CEQA analysis, but it is relevant to the detail required in any mitigation or controlling regulation, variance, and oversight agreement.

**Ind 648-14**

14. Community character is also not specifically analyzed in the CEQA exercise. Yet, community character is at the heart of all the Sections. Nevada County, Grass Valley, Nevada City and Truckee have prospered over the last 40 years. Our down towns are strong and endured economic downturns, Amazon, covid, wildfires, and power outages. New on-line sales revenue sharing regulation is helping to offset the out of town purchasing and sales tax dollar exodus as folks shift spending to on-line. The strength of our economy, based on Economic Resource Council data, is rooted in technology, R&D, seniors, government, tourism, recreation, stewardship, and healthcare. We are perceived as a tourist and recreation destination. Do we want that perception to change to one of an industrial mining town? Mining is our past, not our future.

**Ind 648-15**

15. 4.3-4 "Result in the inefficient or wasteful use of energy" This is a negative impact and the DEIR finds it LS or less than significant and mitigations as NA (Not Applicable). We live in an era struggling to get our arms around climate change, wild fires, and drought. One element at the heart of this all-encompassing area of study is energy use and carbon footprint. How is it possible that a project that could double the commercial power use in Nevada County be



	<p>defined as less than significant? This is wrong and needs new analysis. The Nevada County Climate Action Plan calls for significant energy and carbon reductions. This project must participate in that process.</p>
<b>Ind 648-16</b>	<p>16. 4.3-5 "Conflict with State or local plans for renewable energy or energy efficiency." DEIR designates LS and NA. The Nevada County Energy Action Plan calls for energy and carbon reductions moving forward. The specific language in the Energy Action Plan may be weak and waffle at times it should be specific. However, the intent is there. The goals are there. The Rise Gold IMM project EIR must respect the intent of the local plan and State plans. The EIR must include an energy efficiency plan that shows reducing energy use over the length of the permit. The reductions should be frontloaded. One example of a real mitigation would be to require a portion of the property committed to a solar farm sized to support the project energy use. We require solar infrastructure on new homes, new enterprise must participate in the solution.</p>
<b>Ind 648-17</b>	<p>17. 4.3-7 Carbon Offsets- this family of mitigations should set the standard for what is expected. A mitigation must be CLEAR, FEASIBLE, AND ACHIEVABLE. If the County relies on a future plan or a future action, then the mitigation must identify clear performance standards.</p>
<b>Ind 648-18</b>	<p>18. 4.4-1 ADD- All landscape, habitat mitigations, transplanting, and seed propagation will include weekly monitoring by a qualified biologist to ensure success including the health and prosperity of the plant life. Restoration bonds should be implemented to fund this responsibility for the length of the mining enterprise.</p>
<b>Ind 648-19</b>	<p>19. 4.5-3 Retain a credentialed archeologist to be familiar with the history of the properties and be available to respond in concert with the Sheriff/ Coroner should human remains or Native American artifacts be unearthed. Artifacts would indicate human remains may be in the area.</p> <p>20. The archeologist will establish contact with the Native American community before the project begins to better understand their wishes should an actionable event occur.</p>
<b>Ind 648-20</b>	<p>21. 4.11-7 NID has not agreed to fully commit an unlimited water supply to Rise Gold's IMM project and potential water service to homes with residential well failures. Rise Gold underestimates the potential for damage to existing and future residential well performance. The LS and NA designations are incorrect.</p>
<b>Ind 648-21</b>	<p>22. 4.12-4 Rise Gold must include pedestrian and bicycle lane improvements along the length of the Brunswick Road and Bennett Street property.</p>



Ind 648-22

23. Alternative #1: The No build option is the correct answer. Develop according to the existing land use designation shown in the County General Plan with consideration for current contemporary planning philosophy that reflects planning ideas not consistent in an older Nevada County General Plan. For instance:

- Include pedestrian and bike corridors to connect with Grass Valley, Empire Mine, and Memorial Park.
- Minimize impacts on sensitive habitats and species.
- Require energy efficiency and carbon reduction plans. Require solar farming to reduce dependency on the power grid and energy consumption consistent with the County Energy Action Plan.
- Include open space for animal corridors, visual and scenic integrity.

The DEIR describes the No Project alternative in terms that maximize the development of the Brunswick property. This is not how it would go. This is an amazing important piece of property because of its location in this part of the County at an entryway to the Brunswick Basin. It is located near Empire Mine State Park and Grass Valley. It is flat. **There are many possible uses that would add synergy to the existing thriving local economy that fall within the existing General Plan use designation and are not hard rock mining.** I suggest current thinking of business parks might lean toward mixed use with housing and retail and seek to create a campus environment that is pedestrian friendly. Possible uses that are consistent with a Nevada County economy that has been growing in a sustainable positive direction for at least four decades are: Utilities, Manufacturing, Information, Science & technology, Real Estate, Professional, Arts, Entertainment, and Recreation. All of these would create more jobs, use less energy, have lower carbon footprints, have larger jobs and enterprise building multipliers, and generate more local wealth.





## **INDIVIDUAL LETTER 648: PAUL SCHWARTZ**

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### **Response to Comment Ind 648-1**

As stated on page 4.10-45 of the DEIR, the implementation of Mitigation Measure 4.10-3 would reduce the potential significant noise impact to a less than significant level. The noise analysis of the DEIR considers ambient noise levels at receptor locations. Please see Chapter 4.10 of the DEIR.

As stated on page 4.9-16 of the DEIR, subsurface mining is allowed in all base districts subject to approval of a Use Permit. Surface access to subsurface mining, including vent and escape shafts, is allowed in the AG, FR, M1, M2, P, and PD base districts subject to approval of a Use Permit. Surface mining is allowed in the AG, FR, M1, M2, P, PD, and TPZ Districts and where the property is zoned ME, subject to approval of a Use Permit and Reclamation Plan.

### **Response to Comment Ind 648-2**

Please see Master Response 25 - Nevada County Energy Action Plan.

### **Response to Comment Ind 648-3**

Please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. Note that based on the groundwater model, which was peer reviewed by the County's independent experts, only 7 wells are expected to have a significant drawdown effect from the project. The groundwater impact analysis and related mitigation was peer reviewed by the County's independent experts, who provided input on the analysis and mitigation. Connection to NID water supply at the applicant's cost is provided for 30 parcels, although only 7 are expected to have a significant impact. With regard to unexpected impacts to wells beyond the 7 expected impacted wells, and the total of 30 parcels that are being provided access to NID water supply, as discussed in Chapter 4.8 of the DEIR, Mitigation Measures 4.8-2(a) and 4.8-2(b) require that monitoring wells be installed in the vicinity of the project and that additional baseline data be collected for 12 months prior to dewatering. Likewise, Mitigation Measure 4.8-2(b) requires that during dewatering, data from the monitoring wells is used to assess whether local groundwater wells would be impacted, which in the case of a significant impact would then trigger investigation and immediate replacement of water supply by the applicant at the applicant's cost.

As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells (water level and water quality) within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

### **Response to Comment Ind 648-4**

The commenter states that the DEIR underestimates the level of asbestos exposure that could be caused by the project and strategies to mitigate dust and asbestos emissions. However, the Health Risk Assessment is based on conservative assumptions that likely overestimate asbestos exposure. Please see Master Response 22 – Conservatism used for Asbestos Assumptions.



As stated on page 4.3-42 of the DEIR, use of the NSAQMD's cancer and noncancer thresholds to assess health risk significance for CEQA is consistent with AB 2588 risk assessment procedures. The threshold of significance for health risk is an increased cancer risk of >10 cases per million persons. The Health Risk Assessment prepared for the project concludes that the health risk to the most sensitive receptor will be below this threshold.

Nevertheless, the DEIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission and subsequent implementation of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction, and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

As shown in Table 3-9 of the DEIR, mobile tire washing plants are proposed to be used to wash truck tires of vehicles leaving non-paved areas where engineered fill would be placed. As shown in Figure 3-8 of the DEIR, all roads outside of the engineered fill piles are proposed to be paved. Therefore, vehicle tires will not require washing as they leave the Brunswick site onto public roads and would not leave visible track-out material on public roads. If necessary, the onsite paved roads could be cleaned to ensure employee and other vehicles do not track dust onto public roads. Mitigation Measure 4.3-2 provides several options based on Section e(4)(A)(2) Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations. The project proposes mobile tire washing plants to be used to wash truck tires of vehicles leaving non-paved areas where engineered fill would be placed and not rely on gravel pads or 50 feet of pavement to capture dust. Any sediment from tire washing would be captured onsite by the washing plant and disposed of onsite alongside the engineered fill being placed.

For clarification purposes, Mitigation Measure 4.3-2, on page 4.3-83, has been revised to add the word "or" in bullet point 3 to clarify that a gravel pad is not required if a wheel wash system is employed.

- *All visible track-out material (from vehicles leaving the work site) must be removed from all public roads at least once per day using wet sweeping or a HEPA-filter-equipped vacuum device. Sweeping or vacuuming on public roads shall be conducted so as to avoid peak AM and PM traffic hours.*
- *A gravel pad designed and maintained to effectively clean tires of exiting vehicles, or a wheel wash system, or a minimum of 50 feet of pavement must be placed between the construction area and any public road, and must be used by all exiting vehicles (including personal vehicles and delivery trucks) throughout the duration of the project.*



The above change is for clarification purposes and does not alter the efficacy of the mitigation measure, nor conclusions of the DEIR.

### **Response to Comment Ind 648-5**

As stated on page 4.13-15 of the DEIR, according to Table 4.1 of the Circulation Element of the Nevada County General Plan, Brunswick Road is considered a Minor Arterial.

As discussed on page 4.1-2 of the DEIR, according to the California Department of Transportation (Caltrans) Scenic Highway Program, State Route (SR) 20, 49, and 174 within Nevada County are eligible State Scenic Highways. Eligible state scenic highways, while recognized for aesthetic quality, are not officially designated as scenic highways. Only SR 49/SR 20 has views of the project sites. As SR 49 passes through Grass Valley, it is posted as both SR 49 and SR 20. At the north end of Nevada City, SR 49 turns west toward North San Juan, after which the north-south highway turns east and becomes SR 20. The entirety of SR 49 proceeds in a northbound/southbound direction. As the portion through Grass Valley is oriented north-south, it is therefore referred to throughout the DEIR's analysis as SR 49. The Brunswick Industrial Site is approximately two miles from SR 49 and the Centennial Industrial Site is approximately a 0.5-mile from SR 49.

Notwithstanding the above, as noted in Chapter 4.1, Aesthetics, the DEIR concludes that implementation of the proposed project would result in a substantial degradation to the visual character or quality of the Brunswick Industrial Site as viewed from Brunswick Road, and after implementation of mitigation, the impact would remain significant and unavoidable.

Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 648-6**

The comment states that the DEIR is poorly organized and fails to describe how mitigation measures would reduce impacts to acceptable levels and that mitigation measures must be clear, feasible, and achievable. However, the commenter provides no specifics or evidence as to its assertions and is referred to Chapter 4 of the DEIR.

The DEIR analyzed the project's potential impacts with respect to baseline conditions, as defined in the DEIR, in addition to reviewing potentially significant cumulative impacts based on known or planned development in the region. CEQA Guidelines section 15130 requires an EIR to discuss cumulative impacts of a proposed project. Cumulative impacts are impacts created because of the combination of the proposed project with reasonably foreseeable future projects. DEIR section 5.3 summarizes the cumulative impacts analysis, and each resource analysis in each technical chapter of the DEIR includes an analysis of cumulative impacts specific to that resource.

The commenter states that Section 2.5 of the DEIR includes negative impacts of the project. As stated on page 2-8 of the DEIR, this list consists of areas of controversy that were identified in NOP comment letters and are otherwise known for the project area. Impacts of the project in all the listed subjects are analyzed in the DEIR. See Chapter 4 of the DEIR.

### **Response to Comment Ind 648-7**

Except for the construction of the Service Shaft, no blasting would take place closer than 500 feet to surface. Historic workings above this elevation may or may not be backfilled or used and are not required to be filled. Please see Master Response 29 - Near Surface Workings.



### **Response to Comment Ind 648-8**

As stated on page 4.1-14 of the DEIR, examples of typical scenic vistas include mountain ranges, ridgelines, or bodies of water as viewed from a highway, public space, or other area designated for the express purpose of viewing and sightseeing. In general, a project's impact to a scenic vista would occur if development of the project would substantially change or remove a scenic vista. The County General Plan does not identify any scenic vistas in the vicinity of the Centennial or Brunswick Industrial sites. Impacts to views of the project sites from SR 49, which is included within the County's Scenic Corridor Combining District (SC), are discussed under Impact 4.1-2. Thus, the proposed project would not have a substantial adverse effect on a scenic vista, and a less-than-significant impact would occur.

### **Response to Comment Ind 648-9**

The analysis in DEIR Section 4.1-3 does not consider the previous industrial activity at the site in the analysis. Rather, the determination of less than significant is based on substantial evidence provided in the form of a photometric plan for the Brunswick Industrial Site, inclusive of lighting types and projected lumen intensities across the site. As stated on page 4.1-24 of the DEIR, based on the photometric plan:

[...] the lighting intensities at the northern property line, near East Bennett Road, are at 0.0 foot-candles<sup>9</sup>, and thus, light spillover is not projected to occur off-site. The nearest proposed pole-mounted LED, which is International Dark Sky Association compliant, would be located approximately 100 feet from East Bennett Road. Thus, the existing sensitive receptor along New Brunswick Court would not be impacted by light spillover from the proposed on-site lighting. Similar conclusions can be made for the remainder of the property boundaries, based on the Photometric Plan; no light spillover is projected to occur at the property boundaries.

As stated on page 4.1-29 of the DEIR, the proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and a less-than-significant impact would occur. Please see Section 4.1-3 of the DEIR.

### **Response to Comment Ind 648-10**

The beginning of the comment related to Highway 174 is unclear. The project does not propose any traffic improvements on Highway 174.

Mitigation Measure 4.3-1(a) requires that temporary traffic control shall be provided during all phases of construction to improve traffic flow, as deemed appropriate by the local transportation agencies and/or the California Department of Transportation and construction activities shall be scheduled to direct traffic flow to off-peak hours as much as practicable. As shown in Table 4A of Appendix O of the DEIR, peak hours vary for various intersections but are 7:45AM to 8:45AM and 4:30PM to 5:30PM on Brunswick Road near the Brunswick Industrial Site (intersections 12-17).

Mitigation Measure 4.3-1(b) requires that prior to the initiation of construction, Rise Grass Valley Inc. or its designee shall submit a Construction Exhaust Emissions Minimization Plan to Nevada County or its designated representative for review and approval. The mitigation measure provides specific requirements as stated on pages 4.3-77 and 4.3-78 of the DEIR.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.



Specific traffic management plans and the Construction Exhaust Emissions Minimization Plan are not required for the analysis of the DEIR, but will be required before the construction activities, as specified in Mitigation Measures 4.3-1(a) and 4.3-1(b). Engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.)

#### **Response to Comment Ind 648-11**

The Asbestos Dust Mitigation Plan must be approved by the NSAQMD, is required pursuant to specific performance standards and regulatory requirements as set forth in Mitigation Measure 4.3-2, and is not required to be completed and approved for the analysis of the DEIR. Under California case law, compliance with a regulatory permit or other similar process may be identified as mitigation under CEQA if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards. (CCR Title 14 Section 15126.4.) Please see Response to Comment Ind 648-4.

#### **Response to Comment Ind 648-12**

Based on substantial evidence in the DEIR, the proposed mine water discharge would not cause substantial erosion or sedimentation in South Fork Wolf Creek or significant impacts to sensitive aquatic species. Please see Chapter 4.8 of the DEIR, Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 33 - Groundwater Dependent Vegetation.

#### **Response to Comment Ind 648-13**

Please see Master Response 3 - Operator Responsibility.

#### **Response to Comment Ind 648-14**

Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

#### **Response to Comment Ind 648-15**

Please see Master Response 25 - Nevada County Energy Action Plan, Master Response 27 - Greenhouse Gas Thresholds, Response to Comment Ind 648-16, and Response to Comment Agcy 8-17.

#### **Response to Comment Ind 648-16**

Compliance of the project with EAP strategies has been analyzed in Table 4.3-22 in the DEIR and the project was determined to be consistent with the EAP. Please see also Master Response 25 - Nevada County Energy Action Plan. Regarding a solar energy system, while solar panels are not currently proposed as part of the project, the roof space of the project buildings may be available in the future for installation of solar panels to reduce the project's reliance on the energy grid. However, any such solar power generation would be small in comparison to the requirements of the project. Notably, the GHG emissions presented in the DEIR are conservative, since California regulations will reduce GHG emissions overtime. For instance, Senate Bill 100 requires that zero carbon energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis, although these GHG reducing policies will ultimately reduce the project's carbon footprint.





**Response to Comment Ind 648-17**

Mitigation Measure 4.3-7(b) provides extensive and detailed requirements and standards for carbon offsets. Please see page 4.3-96 of the DEIR and Master Response 28 - Greenhouse Gas Credits.

**Response to Comment Ind 648-18**

The commenter requests that a mitigation measure be added to require all landscape, habitat mitigation, transplant, and seed propagation to include weekly monitoring by a qualified biologist and for restoring bonds to be imposed for the length of the mining enterprise. The commenter does not identify any deficiencies in the DEIR nor significant impacts that would require this mitigation. Numerous regulations and mitigation measures are already imposed on these project activities, as described in Chapter 4.4 of the DEIR, and the mitigation measure proposed by the commentor is not required for the project.

**Response to Comment Ind 648-19**

Mitigation Measure 4.5-3 requires any person who, in the process of project activities, discovers any human remains within the project area, shall cease from all project activities within at least 200 feet of the discovery. In the event that human remains are encountered, the sheriff-coroner shall be notified immediately upon discovery. In the event that Native American human remains are encountered, the Native American Heritage Commission or the most likely descendants of the buried individual(s), who are qualified to represent Native American interests, shall be contacted. Specific treatment of Native American human remains shall occur consistent with State law.

**Response to Comment Ind 648-20**

An unlimited supply of water from NID is not required for the project. Please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

**Response to Comment Ind 648-21**

The commenter states that rise gold must include pedestrian and bicycle lane improvements along the length of Brunswick Road and Bennett Street property. These improvements are not required for the project to mitigate any significant impact, and the impact from project-generated vehicle miles travelled is less than significant. Please see Section 4.12-5 of the DEIR.

**Response to Comment Ind 648-22**

The commenter's preference for the No Project Alternative (Alternative #1) is noted for consideration by the County decisionmakers. Please also see Response to Comment Ind 388-6.



**Individual Letter 649**

3-13-2022

To: Matt Kelley, Senior Planner, Nevada County Planning Department  
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[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

From: Paul S. Schwartz

13812 Meadow Drive, Grass Valley CA 95945

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**Attention: Nevada County Planning Department, Nevada County Planning Commission and Board of Supervisors**

Comments on the DEIR for the Proposal to Reopen the Idaho Maryland Mine

**Ind 649-1**

1. 4.10-1, 2, 3- From one section of the Noise and Vibration report (Pg 4-10-45) "It is conservatively concluded that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or standards of other agencies, and the project's noise impacts could be significant." Seriously consider the setting and context as well. We are a rural community where noise levels are low in contrast to the constant background noise of traffic and urban activity in other cities and counties. Protecting and preserving the quality of our noise landscape is the right thing to do. The property is not currently zoned for heavy industrial mining operations. This is a General Plan designation made with community support and reflecting both community values, environmental integrity, and economic forethought.

**Ind 649-2**

2. The technical Reports reveal the energy requirements and the carbon footprint of the proposed Idaho Maryland Mine (IMM) enterprise are in conflict with the General Plan Energy Action Plan. The mine will require an energy increase equivalent to 12% of the current Nevada County energy load. In addition, it will require doubling the amount of energy currently used by the entire Nevada County commercial energy use. The document discounts the standing and relevancy of the Nevada County Energy Action Plan. Although implementation of the plan is in its infancy, the intent and goals are very clear. A project seeking an 80-year operating permit needs to fully address consistency with those goals and intent. At a minimum, a mitigation requiring an energy efficiency and carbon reduction plans revealing how Rise Gold intends to operate in the spirit of the Energy Action Plan.

**Ind 649-3**

3. The entire analysis of impacts to natural underground water systems lacks the data and analysis to accurately describe potential impacts to existing and future wells in the surrounding residential community. Changes in the natural underground water system resulting from massive dewatering need to be fully and accurately investigated. Projections need to be evaluated against industry know outcomes in similar mining operations to reveal the accuracy of these types of analysis. Similar gold mining enterprise in our county have dried and contaminated wells during the dewatering process. This is difficult to provide ongoing oversight without a clear long term funded plan for the 80-year permit. A plan that includes clearly defined oversight and periodic review and reporting. The plan should include methods, means, and clearly designated roles and responsibilities to monitor and mitigate conditions and damages to underground water sources for this part of the community. For instance, what are the first conclusive indicators of impacts to the natural underground water supply and what is



	<p>the action plan? Rise Gold needs to be required to provide a comprehensive plan and allow time for a peer review process to insure we understand the risks, indicators, and responses.</p>
Ind 649-4	<p>4. The DEIR fails to clearly outline strategy to mitigate dust and particulant pollution from the rock processing and transporting. Because of the risk associated with asbestos and other airborne hazards, manual wetting with water trucks and hoses is not good enough. A mitigation that describes an automated mechanical solution the trucks must go through and be washed and watered down before leaving the IMM or Centennial property is needed. In addition, for the rock processing, piling, and truck loading process, a system of overhead sprinklers or similar is needed to insure a constant level of quality throughout the enterprise. The DEIR must describe a mitigation plan that is more robust than providing on site water trucks and gravel pits for the trucks to drive through.</p>
Ind 649-5	<p>5. Policy related to view sheds, aesthetics, and community character in the General Plan are ignored. An example is the description of Brunswick Road as a minor arterial ignores the fact it is an entryway into the Brunswick basin and Nevada City. As an entryway it will continue to grow in importance and traffic volume. It represents for many guests to our community the first impression they will have and should not be dismissed because it does not have a scenic designation. We all know the cliché about how difficult it is to alter first impressions. A large part of our economy is derived from tourism, recreation activities, and the Arts. Protecting how we are perceived is critical to our long-term economic success. Over time the section of Highway 174 through Cedar Ridge into Grass Valley will see traffic levels flatten and Brunswick Road will become busier and busier. Caltrans investments and improvements to Highway 174 clearly show the importance of this route into our community and Brunswick Road should be recognized and protected from development that impacts its future success as an entryway and major arterial. This section of the traffic analysis and aesthetics impacts needs to be re-evaluated and reworked.</p>
Ind 649-6	<p>6. The DEIR analysis in each section is poorly organized and fails to describe or explain how proposed mitigation measures would reduce impacts to acceptable levels. The cumulative effect to our community of the negative impacts is poorly analyzed, dismissed, and ignored. Chapter 2, 2.5 Areas of Known Controversy includes 23 bullets to describe the breadth of the negative impacts the project carries with it. Mitigation Measures must be clear, feasible, and achievable. They must show how we can measure and determine the proposed mitigated outcome.</p>
Ind649-7	<p>7. 3.0- "New underground workings would be below 500 feet from ground surface." What about existing workings that are less than 500 feet from the surface? Will these be properly filled and no longer used?</p>
Ind 649-8	<p>8. 4.1-1 "Have a substantial adverse effect on scenic vista" The analysis dismisses the height and massive rock infill that would be several stories high in the current IMM valley and rising above Brunswick Road. In addition to that are the multi-story buildings that require variances because they are more than double the acceptable height of buildings as defined in our General Plan and County regulation. How is this Less than Significant (LS) and how does Not Applicable answer to this Negative Impact? The next item in the table outlines a generic landscape plan that is proposed as a solution. This might be OK for a bank or a Wendy's, but it does not respond to the massive change to the viewshed or the extremely tall buildings.</p>
Ind 649-9	<p>9. 4.1-3 "Create a new source of substantial light and glare which would adversely affect day or night time views in the area." The DEIR designates this LS and mitigations as NA. Regardless of previous industrial activity at this location, decades have passed since their departure and the area is now predominantly residential. Introducing "substantial" new light and glare into the setting and dismissing the impact is unacceptable.</p>





**Ind 649-10**

10. 4.3-1 Traffic controls on Highway 174 improvements resulted in 20-30 minutes waiting for the pilot vehicle. If you lived within the project area, one trip could add one hour to your travel time. There needs to be a specific traffic management plan that puts more on the contractor and impacts the traffic flow more efficiently for drivers. Scheduling construction delivery and future trucking to off hours is a good idea. What are the off hours and how is this enforced? The Construction Exhaust Minimization Plan needs to be revealed now as part of the DEIR or specific performance and enforcement standards brought forward. Elements of the plan should not be allowed to be ignored because its inconvenient, costly, or outside the critical path. The project must meet the Federal 8-hours ozone Standard and employ all feasible NOX mitigations to achieve satisfy NSAQMD thresholds. This needs to be spelled out in the EIR.

**Ind 649-11**

11. 4.3-2 The proposed Asbestos Dust Mitigation Plan should be detailed in the DEIR. This is a large part of the negative impacts the project will have on the neighborhood and the community. The generalized statements offered as mitigation measures are insufficient and potentially ineffective. Previous NSAQMD requirements for similar projects included paving in work areas and automated watering systems as opposed to water trucks and gravel drive through pits. The mitigation should include automated wheel washing technology for all vehicles operating on unpaved surfaces. A spray misting system may be required to subdue harmful dust from project operations. The EIR should describe and include as a mitigation available technology that removes harmful fibers from air exiting the mine. In addition, description of an asbestos monitoring program should be part of the EIR and subject to NSAQMD review.

**Ind 649-12**

12. I am concerned about adding significant flows to South Fork Wolf Creek. I was a Wolf Creek Alliance stream care volunteer and adding millions of gallons a day would increase erosion and downstream sedimentation. It would challenge wildlife populations that live in the stream zones. Determining the impacts are less than significant (LS) and mitigations are not needed (NA) is foolishness. Plans for special status species, wetland protections, erosion controls, culvert replacement and monitoring program needs to be spelled out in the EIR.

**Ind 649-13**

13. Given everything we know about Rise Gold's senior leadership and their history in British Columbia, what protections do we have that they will honor agreements and perform professionally. Does Nevada County government have the capacity to inspect, police, enforce, litigate, and control Rise Gold's performance? This maybe outside CEQA analysis, but it is relevant to the detail required in any mitigation or controlling regulation, variance, and oversight agreement.

**Ind 649-14**

14. Community character is also not specifically analyzed in the CEQA exercise. Yet, community character is at the heart of all the Sections. Nevada County, Grass Valley, Nevada City and Truckee have prospered over the last 40 years. Our down towns are strong and endured economic downturns, Amazon, covid, wildfires, and power outages. New on-line sales revenue sharing regulation is helping to offset the out of town purchasing and sales tax dollar exodus as folks shift spending to on-line. The strength of our economy, based on Economic Resource Council data, is rooted in technology, R&D, seniors, government, tourism, recreation, stewardship, and healthcare. We are perceived as a tourist and recreation destination. Do we want that perception to change to one of an industrial mining town? Mining is our past, not our future.

**Ind 649-15**

15. 4.3-4 "Result in the inefficient or wasteful use of energy" This is a negative impact and the DEIR finds it LS or less than significant and mitigations as NA (Not Applicable). We live in an era struggling to get our arms around climate change, wild fires, and drought. One element at the heart of this all-encompassing area of study is energy use and carbon footprint. How is it possible that a project that could double the commercial power use in Nevada County be



	<p>defined as less than significant? This is wrong and needs new analysis. The Nevada County Climate Action Plan calls for significant energy and carbon reductions. This project must participate in that process.</p>
<b>Ind 649-16</b>	<p>16. 4.3-5 "Conflict with State or local plans for renewable energy or energy efficiency." DEIR designates LS and NA. The Nevada County Energy Action Plan calls for energy and carbon reductions moving forward. The specific language in the Energy Action Plan may be weak and waffle at times it should be specific. However, the intent is there. The goals are there. The Rise Gold IMM project EIR must respect the intent of the local plan and State plans. The EIR must include an energy efficiency plan that shows reducing energy use over the length of the permit. The reductions should be frontloaded. One example of a real mitigation would be to require a portion of the property committed to a solar farm sized to support the project energy use. We require solar infrastructure on new homes, new enterprise must participate in the solution.</p>
<b>Ind 649-17</b>	<p>17. 4.3-7 Carbon Offsets- this family of mitigations should set the standard for what is expected. A mitigation must be CLEAR, FEASIBLE, AND ACHIEVABLE. If the County relies on a future plan or a future action, then the mitigation must identify clear performance standards.</p>
<b>Ind 649-18</b>	<p>18. 4.4-1 ADD- All landscape, habitat mitigations, transplanting, and seed propagation will include weekly monitoring by a qualified biologist to ensure success including the health and prosperity of the plant life. Restoration bonds should be implemented to fund this responsibility for the length of the mining enterprise.</p>
<b>Ind 649-19</b>	<p>19. 4.5-3 Retain a credentialed archeologist to be familiar with the history of the properties and be available to respond in concert with the Sheriff/ Coroner should human remains or Native American artifacts be unearthed. Artifacts would indicate human remains may be in the area.</p> <p>20. The archeologist will establish contact with the Native American community before the project begins to better understand their wishes should an actionable event occur.</p>
<b>Ind 649-20</b>	<p>21. 4.11-7 NID has not agreed to fully commit an unlimited water supply to Rise Gold's IMM project and potential water service to homes with residential well failures. Rise Gold underestimates the potential for damage to existing and future residential well performance. The LS and NA designations are incorrect.</p>
<b>Ind 649-21</b>	<p>22. 4.12-4 Rise Gold must include pedestrian and bicycle lane improvements along the length of the Brunswick Road and Bennett Street property.</p>





Ind 649-22

23. Alternative #1: The No build option is the correct answer. Develop according to the existing land use designation shown in the County General Plan with consideration for current contemporary planning philosophy that reflects planning ideas not consistent in an older Nevada County General Plan. For instance:

- Include pedestrian and bike corridors to connect with Grass Valley, Empire Mine, and Memorial Park.
- Minimize impacts on sensitive habitats and species.
- Require energy efficiency and carbon reduction plans. Require solar farming to reduce dependency on the power grid and energy consumption consistent with the County Energy Action Plan.
- Include open space for animal corridors, visual and scenic integrity.

The DEIR describes the No Project alternative in terms that maximize the development of the Brunswick property. This is not how it would go. This is an amazing important piece of property because of its location in this part of the County at an entryway to the Brunswick Basin. It is located near Empire Mine State Park and Grass Valley. It is flat. **There are many possible uses that would add synergy to the existing thriving local economy that fall within the existing General Plan use designation and are not hard rock mining.** I suggest current thinking of business parks might lean toward mixed use with housing and retail and seek to create a campus environment that is pedestrian friendly. Possible uses that are consistent with a Nevada County economy that has been growing in a sustainable positive direction for at least four decades are: Utilities, Manufacturing, Information, Science & technology, Real Estate, Professional, Arts, Entertainment, and Recreation. All of these would create more jobs, use less energy, have lower carbon footprints, have larger jobs and enterprise building multipliers, and generate more local wealth.



**INDIVIDUAL LETTER 649: PAUL SCHWARTZ**

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This letter is a duplicate of Individual Letter 648. Please see the above responses to Individual Letter 648.



**Individual Letter 650**

**From:** [Paul Snyder](#)  
**To:** [hobosupervisors](#)  
**Subject:** Vote NO on the Mine  
**Date:** Friday, February 18, 2022 7:54:28 AM

Dist 1

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**Ind 650-1**

I implore all the BOS's to vote no on the IM mine!!

**Ind 650-2**

The past lawsuits and environmental damage left in the wake of Rise Gold in Canada has shown that they can not be trusted to take care of our town. They have repeatedly misrepresented their local support with fake biased "surveys" that also shows they can not be trusted. If you have read the survey's it's so obviously not credible. The drought and water issues are a huge unknown moving forward.

**Ind 650-3**

We have many abundant resources for tourism that could be jeopardized with the mine. Have you been by the 5 Mile parking during prime biking season? The Pioneer trail , Hoot Trail have been a huge boon for our economy. The new Parliament trail being constructed, and the proposed Pines to Mines and Sugarloaf trails are the direction the county should be going in. I thank you for your support of these projects.

**Ind 650-4**

Please use best judgement for what is really important to the counties residents and

**VOTE NO** on the mine

Thank You,  
Paul Snyder

**Ind 650-5**

p.s. the recall is a complete joke and a waste of time. Thank your doing your best to keep us safe in uncertain times



## **INDIVIDUAL LETTER 650: PAUL SNYDER**

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### **Response to Comment Ind 650-1**

Please see Master Response 3 – Operator Responsibility.

### **Response to Comment Ind 650-2**

The comment expresses a general opinion that the “surveys” associated with the proposed project lack credibility, but does not provide specific examples that would allow for a detailed response. Please see Master Responses 15 and 16.

### **Response to Comment Ind 650-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

### **Response to Comment Ind 650-4**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

### **Response to Comment Ind 650-5**

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 651**

**From:** Paula Strang <pkstrang96@gmail.com>  
**Sent:** Monday, April 4, 2022 3:30 PM  
**To:** Idaho MMEIR  
**Cc:** robertwheatley1099@gmail.com; Karin Huff Wheatley; Georgie; Art Derby; DEIRcomments@cea-nc.org; Kimmie  
**Subject:** Comments on Idaho-Maryland Mine Project SCH# 2020070378 Draft Environmental Impact Report (DEIR)

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Dear Mr. Kelly,

Our family has owned property on Wolf Creek in Nevada County for over **53** years. Four generations of us have enjoyed this beautiful, refreshing waterway. The thought of the Idaho Maryland mine reopening causes serious concern regarding the health of Wolf Creek.

**Ind 651-1**

The DEIR outlines a water treatment plan that would allow treated mine groundwater to be discharged into South Wolf Creek and thereby Wolf Creek. Mine owners hope to obtain a Limited Threat Discharge Permit from the State Regional Water Quality Control Board, page 3-18, with the treated water covered as Tier 3 discharge, page 4.8-28.

The project anticipates completion of the initial dewatering of the mine in approximately 6 months, pumping at a rate of 2,500 gpm, page 4.8.42. The treated water would be monitored and tested but the owner will only be required to submit quarterly monitoring reports to the State Regional Water Quality Control Board. This is too great a period of time, allowing potential pollutants to wreak havoc on the creek before any governing entity can stop the flows.

I request reporting of the water quality monitoring be done more frequently, such as monthly, to stop potential pollution more quickly.

**Ind 651-2**

I request that the monitoring be conducted by an independent party.

Lastly, on page 3-18, this statement is made: "The water discharged into South Fork Wolf Creek is expected to be at least as good or better quality than the water typically flowing through South Fork Wolf Creek." I would like to know the basis for this claim.

I ask that the DEIR be revised to address these concerns. Thank you.

**Ind 651-3**

Respectfully,

Paula Strang

10591 Salcido Lane  
Grass Valley, CA 95949  
[pkstrang96@gmail.com](mailto:pkstrang96@gmail.com)





## **INDIVIDUAL LETTER 651: PAULA STRANG**

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### **Response to Comment Ind 651-1**

The commenter states that water quality monitoring for discharges to South Fork Wolf Creek will occur on a quarterly basis. The commenter states this interval period is too long, and pollutants may be discharged to the creek in between reports. The commenter does not state why quarterly monitoring reports under the State's Limited Threat Discharge Permit is inadequate. Water monitoring is conducted under the requirements and oversight of the Central Valley Regional Water Quality Control Board. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 651-2**

The commenter requests that the water monitoring be conducted by an independent party. The Central Valley Regional Water Quality Control Board would specify the location of the sampling, but reports would be submitted by the Project Applicant. (DEIR, p. 4.8-45.) Water monitoring is conducted under the requirements and oversight of the Central Valley Regional Water Quality Control Board. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 651-3**

The commenter would like to know how the project's on-site water treatment system would treat water from the mine to be the same quality or better to the existing water in the South Fork Wolf Creek. As shown in Table 3-9 of Appendix K.2, water samples from South Fork Wolf Creek have elevated Iron and Manganese which are above water quality goals. Treated mine water would have lower levels of Iron and Manganese. The County's independent consultant, West Yost, peer reviewed the Water Treatment Plan Design Report and confirmed that the proposed method of treatment would be adequate to successfully treat mine water to comply with Regional Water Board effluent limitations. (DEIR, p. 4.8-41.) The commenter is also referred to Master Response 35 - Discharge to South Fork Wolf Creek.



**Individual Letter 652**

Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Ave. Suite 170  
Nevada City, Ca. 95959

April 2, 2022

Dear Mr. Kelley,

**Ind 652-1**

This letter is in response to the notice of a Draft Environmental Impact Report (DEIR) for the Idaho-Maryland Mine Project and to express concerns of restarting 1950's industries in my neighborhood. I am a Grass Valley resident and have been for 26 years I am a dressage horse trainer. I live off Greenhorn Rd, within a mile of the Idaho-Maryland Brunswick site. My husband and I have examined much of the documentation in the DEIR. I have concerns.

Climate Change is having a dramatic effect on "average" rainfall. A lower average rainfall will have negative effects on any modeling/analysis results. Climate change is real and it will affect the analysis of expected impacts of mining operations. It must be considered.

**Ind 652-2**

However, because the full effect of Climate Change to Nevada County is not yet known and therefore could not have been considered in the DIER (properly)!

Chemicals and particulates will disperse somehow and could be harmful to us and live stock (horses)

**Ind 652-3**

I am concerned about noise pollution due to mining activity and increased truck traffic. (The DEIR indicates that the noise is acceptable according to County regulations. Acceptable to who?

Blasting rock under nearby properties will disrupt normal life functions not to mention the disruption of horse training exercises.

**Ind 652-4**

Grass Valley has not been a mining town for 70 years. Times have changed! We have developed new residential neighborhoods, new culture, and businesses. In addition, the climate has clearly changed and is changing to the point of no longer sensibly able to support the enormous water demand such a venture dictates. Do not allow this level of industrial operation to restart in Grass Valley especially in a residential neighborhood after all these years.

Sincerely,

Peggy Kelly (530) 274 8819  
12748 The Hollow  
Grass Valley

[peggyrkelly@gmail.com](mailto:peggyrkelly@gmail.com)



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## **INDIVIDUAL LETTER 652: PEGGY KELLY**

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### **Response to Comment Ind 652-1**

This comment is introductory in nature and states that climate change is impacting average rainfall. The comment also states that a lower average rainfall will negatively impact any modeling or analysis associated with the project and must be considered. Lastly, the commenter states that, because the full effect of climate change is unknown, the DEIR could not have considered that full effect.

The DEIR addresses climate change and its impacts to the variability of precipitation in the region. (DEIR, pp. 4.3-11–4.3-19.) The DEIR specifically discusses that long-term changes to precipitation may be no more than 10 to 15 percent of current totals. (DEIR, p. 4.3-16.) Please also see Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 652-2**

The commenter states that chemical and particles will disperse somehow and could be harmful to people and livestock but provides no further details.

The DEIR discusses impacts to air quality in Chapter 4.3, hazards and hazardous materials in Chapter 4.7, and hydrology and water quality in Chapter 4.8. Please also see Master Response 18 regarding air quality thresholds, Master Response 19 regarding NSAQMD criteria pollutant thresholds during operations, and Master Response 35 regarding the discharge to South Fork Wolf Creek.

### **Response to Comment Ind 652-3**

The commenter is concerned about noise pollution from mining activity and increased truck traffic. The commenter indicates that the DEIR determined that noise produced by the project is acceptable to Nevada County regulations but then questions who would be accepting of the noise levels produced by the project. The commenter also states that blasting associated with the project would disrupt normal life functions and would disrupt horse training exercises.

The DEIR analyzes noise and vibration associated with the project in Chapter 4.10 and traffic impacts in Chapter 4.12. For noise and vibration, the DEIR found that the project would produce a substantial increase in ambient noise levels due to initial potable water pipeline construction activities along East Bennett Road, which are significant and unavoidable. (DEIR, p. 4.10-27.) However, the DEIR found that all other noise-related and vibration-related impacts would be mitigated to less than significant. (see generally DEIR, § 4.10.) The commenter provides no evidence that these conclusions are incorrect with regard to horse training exercises.

### **Response to Comment Ind 652-4**

This comment states that, because of the changing climate, it is not sensible to use water for the project. This comment presumably refers to the project's impacts to groundwater. The DEIR found that the implementation of mitigation measures, specifically a groundwater monitoring plan, well mitigation plan, and requirements to provide an alternative supply of domestic water would mitigate any impacts to groundwater supplies or groundwater recharge to less than significant. (DEIR, p. 4.8-54.)

The comments regarding the general opposition to the project are noted and the commenter is referred to Master Response 1 (Non EIR/Administrative Issues.)



**Individual Letter 653**

**From:** Penelope Curtis <penelcurtis@gmail.com>  
**Sent:** Monday, April 4, 2022 11:15 AM  
**To:** Idaho MMEIR; DEIRcomments@cea-nc.org; Heidi Hall  
**Subject:** IMM/DEIR

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To Whom It May Concern:

The critical issue we face right now is a lack of groundwater!!! We have been in a drought period for several years now, with the past 2 being devastating to our environment. Unless you were on vacation in Hawaii for a month in late December and January, you could not have missed the devastation the snowmageddon caused!

Ind 653-1

You would have to be blind to not see the hundreds of trees that snapped and fell. Why this year? Over the 32 years I have lived here, I have experienced many winters where 3 1/2 feet of snow fell in my yard with little if any damage to the surrounding trees. But this year, like everyone else, the Ponderosa snapped at about 30 feet and Live Oaks came crashing down because the groundwater has become depleted and the trees are sick!!! For years, I recorded about 66 inches of rain annually with much of it coming down in January, February, March and April but this year we have had so little last fall's leaves are still dry and not decomposing into mulch and soil.

We CANNOT afford environmentally to have the Idaho-Maryland Mine reopen! They will first drain the existing underground tunnels which are quite extensive. This will cause underground water throughout the area to be drawn toward the pull of the tunnel's water vacuum. That will mean our already depleted soils will become more depleted with many more trees dying and becoming fuel for the annually occurring wildfires!

Is opening the Idaho-Maryland Mine more important to the County than the health and well-being of our environment under these devastating climate circumstances? Quite frankly I am aghast that the County would even consider re-opening the mine right in the middle of our community with all of the other inherent environmental dangers like noise, mine waste, greenhouse gases, plus creating more toxins to clean up!

Ind 653-2

Please stop this madness and decline the DEIR going forward!

Sincerely,  
*Penelope Curtis*

19486 Tiger Lily Lane  
Grass Valley, CA 95945

530.798.5955 (cell)



## **INDIVIDUAL LETTER 653: PENELOPE CURTIS**

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### **Response to Comment Ind 653-1**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Responses 1 (Non-EIR / Administrative Issues), 15 (Adequacy of Groundwater Monitoring Wells), 16 (Drought and Climate Change), and 33 (Groundwater Dependent Vegetation).

### **Response to Comment Ind 653-2**

Please see Master Responses 1, 8 (Mine Waste Characterization), 9 (Historical Mine Waste at Centennial Site), 16, and 27 (Greenhouse Gas Thresholds). The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 654**

Matt Kelley,  
Senior planner  
Nevada County Planning Department  
950 Maidu Avenue  
Suite 170  
Nevada City, Ca.  
95959-7902



cc: Heidi Hall, District 1 Supervisor: Ed Scofield, District 2 Supervisor: Dan Miller, District 3, Supervisor: Sue Hoek District 4 Supervisor: Hardy Bullock , District 5 Supervisor:

Dear Matt Kelley,  
Senior planner

**Ind 654-1**

I am opposed to opening the Idaho Maryland Mine!

My family and I have lived in Nevada County for forty one years. During that time we have Enjoyed swimming in the river and hiking the many beautiful trails. I, like many other residents of Nevada County, feel very invested here.

We were drawn here by its natural beauty and the peacefulness of the environment. During our many years here, we have lamented the destruction of the environment,, in the past by Gold mining. We believed that the time of this destruction was in the past. Now that we know About the health hazards of gold mining, I am hoping that the Idaho Maryland Mine will NOT Be approved.

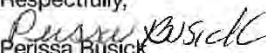
**Ind 654-2**

I am concerned about our air quality, the lowering of the water table in our wells, especially During this time of extreme drought, the safety of explosives during these extreme fire seasons, Wildlife and creek destruction, the noise and pollution from trucks making so many trips a day. We already have toxic air. Do we need to add more dust from the construction of this mine to The air we breathe. We have many elderly, retired people here and children who need the cleanest air possible. The construction of this mine will affect our health adversely. Our property values will decrease. There are, I believe, few factors that mitigate the risks our community will face should this mine be approved.

**Ind 654-3**

I would like to point out that the Grizzly Hill School STILL has contaminated water and needs to Use an expensive filtration system in order to have drinkable water. This was from the Siskon Mine in the 1990's.

Please vote No on opening the Idaho Maryland Mine. Thank you.

Respectfully,  
  
Perissa Busick  
P.O Box 742,  
Nevada City, Ca  
95959



## **INDIVIDUAL LETTER 654: PERISSA BUSICK**

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### **Response to Comment Ind 654-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 654-2**

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not enable a more specific response. For concerns related to air, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. For concerns related to well impacts and drought, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change. Regarding safety of explosives, please see Chapter 4.7, Hazards and Hazardous Materials. For noise concerns, please see Chapter 4.10, Noise and Vibration. Property value is a subject outside the scope of CEQA – please see Master Response 1.

### **Response to Comment Ind 654-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 655**

**From:** pete christakes <petec030@gmail.com>  
**Sent:** Sunday, April 3, 2022 7:17 AM  
**To:** Idaho MMEIR  
**Subject:** The mine

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**Ind 655-1**

Do you ever hear the owls hooting in the morning ? Or watch the stars at night? Or just sit on your patio and listen to the quiet. I do

If the mine opens all that will be gone. Just the truck noise alone 24 hrs a day will be too much.

I moved to grass valley in the early 80s to get away from all the city lights and noise and be in nature.

The impact to the environment will be devastating!

Instead we should be focusing on recreation, boating biking, hiking, sports, and the Tourist trade.

Thanks for your time Pete Christakes



## **INDIVIDUAL LETTER 655: PETE CHRISTAKES**

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### **Response to Comment Ind 655-1**

DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 656**

**From:** Pete <yubawaterdog@gmail.com>  
**Sent:** Sunday, April 3, 2022 2:15 PM  
**To:** Idaho MMEIR  
**Subject:** No Mine Please!

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**Ind 656-1**

Please remember that the mining industry has the worst environmental record of any industry, and that is saying a lot!

Within a half mile of my home are three abandoned mines that the extractors left for others to clean up. There are literally thousands within the state. No matter what they promised up front, they declare bankruptcy and walk away. Literally, they get the gold and somebody else gets the shaft. Let's not let it happen again.

The impact on water, traffic, housing, etc. also means major impacts right away.

Economic growth is not a challenge in our region. Maintaining a healthy environment, for both nature and humans while growing, is the challenge.

Please oppose any efforts to open large scale mining in our area.

**Ind 656-2**

Thank You,

Peter Arpin  
15352 Stonehill Dr.  
Nevada City, CA  
530-219-5660





## **INDIVIDUAL LETTER 656: PETER ARPIN**

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### **Response to Comment Ind 656-1**

The comment does not directly address the adequacy of the DEIR. Regarding water concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding the general traffic concerns, please see Chapter 4.12, Transportation. Regarding housing, please see the discussions and analyses in Chapter 4.9, Land Use and Population and Housing, of the DEIR.

### **Response to Comment Ind 656-2**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 657**

**From:** [Peter Brewer](#)  
**To:** [IdahoSupervisors](#)  
**Subject:** Comments About the Mine  
**Date:** Sunday, January 30, 2022 11:43:28 AM

Dist 1

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**Ind 657-1**

**Why would we want to do this?** I am skeptical of the happy talk about the jobs that will be created and the economic benefits to the community. At what cost? If you want to create jobs and bring money into the community, apply yourselves to getting high-speed, fiber-optic Internet to all households. This will bring an influx of highly-educated, well-paid professionals to our area, with no negative environmental impact. Why let our community suffer irreparable environmental damage so a few Canadians can make more money at our expense?

**Ind 657-2**

**Excerpts from an article in The Atlantic, “Is California on the Verge of a Second Gold Rush?”** <https://apple.news/Aacn6zzIzRDilrDnwNGWqYA>  
Rise Gold has pledged to mitigate the environmental impact of its new mining operation in part by employing a technique called “paste backfilling,” which involves injecting a mixture of water, mine waste, and a binder (often cement) into mining tunnels. The practice helps provide structural support and reduce the amount of aboveground mine waste. There is some science to support the benefits of this approach, but it’s only a partial solution and there are lingering uncertainties about its long-term impact.

**Ind 657-3**

Mining creates a lot of waste, including the rock that doesn’t contain enough gold to extract (called “waste rock”) and the slurry left over after gold has been extracted from ore (called “tailings”). Both waste rock and tailings can contain toxic substances that threaten to pollute groundwater and surface waters if not properly mitigated.

**Ind 657-4**

Grass Valley has been dealing with the fallout of Gold Rush–era mining for decades. Arsenic, which occurs naturally in the gold deposits of the Sierra Nevada foothills, remains an ongoing problem in the area. Old tailings can still leach heavy metals decades after mining operations have ceased. In Grass Valley, the Central Valley Regional



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- Ind 657-5** Water Quality Control Board documented high concentrations of arsenic in a pile of tailings nicknamed “the Red Dirt Pile.” In 2020, high concentrations of lead, mercury, and arsenic were found in samples taken from a former mine-waste disposal area that now supports approximately four and a half acres of wetland habitat. That disposal area, known as the Centennial site, is owned by a subsidiary of Rise Gold called Rise Grass Valley.
- The Centennial site was polluted enough to warrant consideration for listing as a federal Superfund site, but Rise Gold avoided federal regulation by agreeing to undertake its own cleanup.
- Ind 657-6** Even when rock has little or no heavy metals, disposing of it can be a significant challenge. According to Rise Gold’s website, the Idaho-Maryland mining operation historically had to remove a ton of rock for every half ounce of gold it recovered. “These mining companies come along and they want us to not notice that they’re going to have a huge amount of mine-waste rock,” says Elizabeth Martin, who recently retired as CEO of the Sierra Fund, a local conservation group based in nearby Nevada City. Rise Gold’s draft environmental-impact report says the plan will result in approximately 182,500 tons of material produced per year that will need to be transported and then used as engineered fill. By comparison, a large dump truck can carry about 14 tons. Multiply that by more than 10,000, and the visual is “beyond most people’s imagination,” says Martin.
- Ind 657-7** Paste backfilling is widely regarded as a more environmentally friendly way to dispose of mine waste. There is evidence that locking tailings up in cement decreases their permeability and stabilizes any heavy metals within them. There are still questions, though, about whether or not arsenic and heavy metals will stay put in the paste-backfill material over the long term. The leaching behavior of arsenic depends on a lot of different factors, including the binder used in the backfill and the chemical content of the tailings. The biggest unknown is what happens in the future, when the mine closes and the pumps shut down, which will let groundwater flow into the backfilled tunnels. Some studies have noted that even low levels of leaching could continue for years, potentially contaminating drinking water or nearby rivers and streams.
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- Ind 657-8** Heavy-metal leaching is high on the list of concerns in Grass Valley. Rise Gold promises that its operations will be clean, but even so, the company's hydrology report does note arsenic leaching from some test samples. The leaching tests, meant to simulate what might happen to a waste-rock pile when it rains, found that arsenic leached from samples of the mineral type serpentinite at concentrations 17 times greater than the water-quality standards.
- Ind 657-8** Underground mining operations also intersect with the water table, which means the existing tunnels have to be dewatered, and the water that's pumped out of the tunnels has to be treated before it's released aboveground. "The water coming from these mines that they're dewatering is full of arsenic, manganese, iron, and other heavy metals," says the biologist Josie Crawford, the executive director of the Wolf Creek Community Alliance, another local group that opposes the mine. "It will be treated, but it needs to be treated forever."
- Ind 657-9** Many conservationists and community opposition groups see gold mining as a battle between nature and greed, and question whether the pursuit of gold is really worth so much environmental destruction.



## **INDIVIDUAL LETTER 657: PETER BREWER**

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### **Response to Comment Ind 657-1**

The commenter states that the economic benefits of the project are outweighed by its environmental impacts. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 657-2**

The commenter is concerned about the use of cement past backfill (CPB) in the Idaho-Maryland Mine. Please see Response to Comment Ind 14-6.

### **Response to Comment Ind 657-3**

The commenter is concerned about the mining waste containing toxic substances. The commenter is referred to Master Response 8 - Mine Waste Characterization.

### **Response to Comment Ind 657-4**

The commenter states that historic mine tailings can leach arsenic into the environment. The commenter also states that the Centennial Industrial Site is highly contaminated. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.

### **Response to Comment Ind 657-5**

The commenter states that the Centennial Industrial Site is polluted to the extent that it qualifies as a Superfund site. The commenter is referred to Master Response 9 - Historical Mine Waste at Centennial Site.

### **Response to Comment Ind 657-6**

The commenter implies that, based on the amount of waste rock to be removed from the Idaho-Maryland Mine, the number of trucks necessary to transport the waste rock is unimaginable. The comment does not identify a specific inadequacy with the DEIR and without additional detail, a specific response cannot be provided. Please see Master Response 1.

### **Response to Comment Ind 657-7**

The commenter is concerned about the potential for toxic substances to leach from the CPB. The commenter is referred to Master Response 8 - Mine Waste Characterization.

### **Response to Comment Ind 657-8**

The commenter is concerned that the treated water from the Idaho-Maryland Mine will adversely impact South Fork Wolf Creek. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek. As stated on page 4.8-51 of the DEIR, after mining is completed, and as underground mine workings fill with groundwater, water from the underground mine workings would begin to seep from the existing drains. The water that would seep from the underground workings is anticipated to have similar water quality to the water that currently discharges from the existing drains. Specifically, it may contain elevated levels of iron and manganese. Therefore, the condition after mining is completed would be similar to existing, or baseline, conditions, such that re-activation of the seeps would not represent a potentially significant impact under CEQA. Although part of the existing environmental setting, some of the seeps have elevated arsenic levels that could pose a threat to human health or the environment. However, despite these existing discharges from the drains, the reported concentrations of all metals and other constituents in the Wolf Creek samples are well below the NPDES water quality standards.





**Response to Comment Ind 657-9**

The commenter states that some questions whether gold mining is worth the impacts to the environment. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.



**Individual Letter 658**

**From:** peter fromm <moagi1951@gmail.com>  
**Sent:** Sunday, April 3, 2022 1:05 PM  
**To:** Idaho MMEIR  
**Subject:** Idaho-Maryland Mine Draft EIR is Inadequate

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Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Ave, Ste 170  
Nevada City, CA 95959

Dear Mr. Kelley:

The Draft Environmental Impact Report submitted by Rise Gold is inadequate for many reasons, but I will focus on only two: air and water.

Toxic Air Contaminants

Asbestos and crystalline silica are two substances which are hazardous when inhaled. They will become airborne when the material containing them is broken

Ind 658-1



or crushed, as will be the case during the mining operation. Table 4.3-3 shows the attainment status of Respirable Particulate Matter (PM10) as NONATTAINMENT.

Ind 658-2

In addition, the only monitoring station for this type of particulate matter is in Yuba City – 31 miles from the mining site. This is totally inadequate. We need better data. Also, how will the grading change once the mine is fully operable? It cannot get better, and I cannot afford to risk my health, and that of my family just so that a foreign company can turn a profit.

-  
Water

According to recent studies, the current mega draught is the worst in 1200 years!!! It should be obvious, but during a draught, water levels in lakes, streams, reservoirs and aquifers goes down. In addition, the DEIR states that MILLIONS of gallons of water per day will be removed from the mine.

Ind 658-3

When that happens, more water will backfill whatever is pumped out. And the source of that backfill will be the aquifers which feed our local wells.

If our aquifers are threatened, each affected homeowner will need make other arrangements (i.e. NID). I checked with them to determine the cost and timeframe required to connect to their system. As it turns out, the cost is exorbitant. In my case, approximately \$150,000. And after that, I will have the opportunity to pay for something which is currently essentially free.

So all the affected well owners are asked to subsidize this environmentally destructive operation.

Under section 4.8-2(b), the DEIR states: "If, based on the GMP, it is determined that mining operations are resulting in a significant impact to any well(s) (i.e., a 10



percent or greater reduction of the water column of any well), pursuant to Nevada County General Plan Policy 17.12, the project applicant shall be responsible for providing a comparable supply of water to such homes or businesses whose wells are significantly impacted, and if necessary, providing an *immediate* water supply until the source of the problem is determined and rectified.”

Ind 658-4

The DEIR does not include a definition of the word *immediate*. I believe that their definition and mine do not agree. What happens if my well runs dry? When will someone come out to my house to investigate and remediate the situation? How long will that process take? How can anyone live without water? If this process takes more than a few days (or if the project applicant disputes their culpability in the loss of water), where are we then? Obviously, we will not be able to occupy (or sell) our home.

Due to the above, as well as all the other hazards and destruction outlined in the DEIR, I’m hopeful that the planning department and the Board of Supervisors will compel Rise Gold to revise this totally inadequate report.

Ind 658-5

Thanks for your consideration,

Peter Fromm

14006 Liquidambar Lane

Grass Valley, CA 95945

[Moagi1951@gmail.com](mailto:Moagi1951@gmail.com)



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## **INDIVIDUAL LETTER 658: PETER FROMM**

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### **Response to Comment Ind 658-1**

The commenter states that the project will result in the release of toxic air contaminants, namely asbestos and crystalline silica, but does not state how the DEIR is inadequate. Chapter 4.3 of the DEIR analyzed asbestos and crystalline silica emissions from the project and found the associated impacts to be less than significant after mitigation. (DEIR, p. 4.3-82.) The commenter is referred to Master Response 21 - Conservatism of Silica Assumptions, and Master Response 22 - Conservatism of Asbestos Assumptions.

### **Response to Comment Ind 658-2**

The commenter states that the ambient air pollutant monitoring stations and data provided in the DEIR are not representative of the project site. The commenter does not suggest any stations that would have data more representative of the project site. Of note, the ambient data included in Table 2 in Appendix E.1 of the DEIR, and summarized in Table 4.3-4 of Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR, are provided as context for the existing local ambient air quality. Significance determinations, however, are based on comparison to the NSAQMD thresholds. As discussed on page 4.3-41 of the DEIR, the NSAQMD established thresholds of significance for CEQA purposes to achieve and maintain the National and California Ambient Air Quality Standards (AAQS). Because an AAQS is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the AAQS, a project that complies with the thresholds established by a local air district, such as the NSAQMD, would not result in adverse effects to human health related to criteria pollutant emissions, which were developed based on compliance with the applicable AAQS. Regarding emissions quantification, the DEIR employed industry standard and vetted approaches and quantification equations, such as factors developed by the United States Environmental Protection Agency (EPA) in the AP-42 Compilation of Air Emissions Factors and by the California Air Resources Board (CARB) in the OFFROAD and EMFAC models. The assumptions and factors incorporated in the analysis are detailed in "Method of Analysis" section of Chapter 4.3 of the DEIR, starting on page 4.3-44.

### **Response to Comment Ind 658-3**

The commenter is concerned that the dewatering of the mine will have adverse impacts to groundwater supplies. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

### **Response to Comment Ind 658-4**

The commenter is states that the DEIR does not define the word "immediate" in the context of the Project Applicant providing water supply in the event that the dewatering of the mine impacts groundwater wells. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells.

### **Response to Comment Ind 658-5**

The commenter states that, due to the above, and the other "hazards and destruction" outlined in the DEIR, the commenter urges the County to revise the DEIR. The comment is noted for the decisionmakers.





**Individual Letter 659**

**From:** [Peter Stevenson](#)  
**To:** [RCS Public Comment](#)  
**Subject:** Rise Gold Mine  
**Date:** Monday, February 28, 2022 6:53:07 AM

**Dist 5**

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If you value in any way the quality of life in Nevada County you must not approve Rise's application. Peter Stevenson 12481 Palmer Road, Nevada City, 95959 (510) 793-9569

Sent from my iPad

**Ind 659-1**



## **INDIVIDUAL LETTER 659: PETER STEVENSON**

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### **Response to Comment Ind 659-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project and quality of life concerns, which are outside the scope of CEQA. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 660**

**From:** Peter Stevenson <ps98212@gmail.com>  
**Sent:** Monday, April 4, 2022 7:46 AM  
**To:** Idaho MMEIR  
**Subject:** Traffic impacts

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**Ind 660-1**

I am not sure why it is that county supervisors frequently fail to consider traffic impacts before approving projects especially considering the unusual and minimally engineered traffic corridors in this county. The Idaho Maryland/49 corridor is already accident prone and congested without adding the impacts that the mine operation will have. I am hoping that you will not approve their application. Peter Stevenson, 12481 Palmer Road, Nevada City, 95959 (510) 793-9569

Sent from my iPad



## **INDIVIDUAL LETTER 660: PETER STEVENSON**

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### **Response to Comment Ind 660-1**

The comment does not directly address the adequacy of the DEIR. Please refer to Chapter 4.12, Transportation, of the DEIR for a detailed traffic analysis, including the Brunswick Road segment raised by the commenter. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 661**

**From:** [Rachael Elam](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** Against reopening of mine  
**Date:** Monday, April 4, 2022 5:05:00 PM

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Hello,  
As a resident of Nevada county for a decade and as an employee who works less than a mile from the site of the mine, I would like to express my dissent over the reopening of the mine. Reasons include environmental impacts related to noise, water, air, and ground pollution. I also feel that the increase in job creation does not outweigh the negative consequences our town will suffer if the mine reopens.

Warmest Regards,  
Rachael Elam  
530-913-3119  
Cascade Shores, NVC

**Ind 661-1**





## **INDIVIDUAL LETTER 661: RACHAEL ELAM**

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### **Response to Comment Ind 661-1**

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not enable a more specific response. For concerns related to air, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. For concerns related to well impacts, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. For noise concerns, please see Chapter 4.10, Noise and Vibration. Regarding ground pollution, please see Chapter 4.7, Hazards and Hazardous Materials and Master Response 8 – Mine Waste Characterization.



**Individual Letter 662**

**From:** [Rachel](#)  
**To:** [hcbfsupervisors](#)  
**Subject:** I oppose the mine  
**Date:** Sunday, January 30, 2022 9:17:04 AM

**Dist 1**

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**Ind 662-1**

Hi Heidi,

Thank you so much for checking on me and offering help during our 2 week power outage. I hope your new year is off to a great start.

I am writing to you as your constituent to express my opposition to Rise Gold reopening the mine.

**Ind 662-2**

I am opposed to reopening based on water usage. At a time when there are signs on the sidewalks in downtown Nevada City about restricting water usage, I can't fathom why we would entertain a business that will waste and contaminate an astronomical amount of water in our community. To me, this detrimental impact outweighs all other factors.

The mine will use 1.2 million gallons a day every day after pumping 815 million gallons of water to begin mining. The mine will contaminate this water. The mine's usage of and contamination of water are facts. The mine's ability to clean the water after is irrelevant to my opposition.

**Ind 662-3**

As a colleague wrote, "ongoing noise and possible loss of wells and lower property values, and those living along routes to be travelled by trucks hauling tailings at all hours, have to be considered first and foremost."

**Ind 662-4**

This article further cemented my opposition to Rise Gold reopening the mine. I thought it would be of interest:

Is California on the Verge of a Second Gold Rush?  
<https://www.theatlantic.com/science/archive/2022/01/gold-mines-reopening-california/621403/>

Sincerely, Rachel  
Resident in district 1



## **INDIVIDUAL LETTER 662: RACHEL**

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### **Response to Comment Ind 662-1**

The comment does not address the adequacy of the DEIR. Please see responses to more specific comments below.

### **Response to Comment Ind 662-2**

The commenter opposes the mine's use of water, which is noted for the record and forwarded to the decisionmakers. The commenter also states that the mine's contamination of water is a fact. The particular concern is unclear as the mine would pump existing groundwater from the underground workings of the mine and treat this water at an on-site water treatment plant, permitted by the State, prior to discharging the treated water into South Fork Wolf Creek. Please see Master Response 35 (Discharge to South Fork Wolf Creek) for further details.

### **Response to Comment Ind 662-3**

DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 has been required to reduce this impact to a less than significant level. For concerns related to well impacts, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Property value is outside the scope of CEQA – please see Master Responses 1 and 2.

### **Response to Comment Ind 662-4**

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 663**

**From:** [Ralph](#)  
**To:** [hcbosupervisors](#)  
**Subject:** Rise Reported County determinations on the Idaho-Maryland Mine  
**Date:** Tuesday, February 22, 2022 10:25:57 AM  
**Attachments:** [RiseGoldLetterToWellOwners Feb2022.pdf](#)  
[ConcernsAboutRiseGoldMailers Feb22.pdf](#)

Dist 3

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Dear Supervisors

**Ind 663-1**

As you may be aware, Idaho-Maryland Mine owner Rise Gold Corp has sent out yet another mailer to Nevada County residents, this time claiming that "Nevada County has just completed the most thorough environmental study in its history," along with numerous unresolved claims about the project. The mailer includes a form for supporters to mail in to Rise Gold.

We want to bring your attention to another letter that was sent to well owners in the mine area. (Copy included)

**Ind 663-2**

The letter states: "**The County has determined** that no domestic water wells will be drained by mine dewatering." that "**The County has determined**, using a safety factor of 100%, that several wells...could be impacted...to a maximum of 10 feet," and "**The County has determined** that there is no threat to water quality to domestic water wells from the Idaho-Maryland Mine Project."

We feel that it would serve the public interest for the County to issue a clarifying statement regarding the status of the Draft EIR and the status of determinations by the County.

**Ind 663-3**

Thank you.  
Sincerely,  
Ralph

Ralph Silberstein, President  
CEA Foundation  
[ralph@cea-nc.org](mailto:ralph@cea-nc.org)  
[ralphasil@gmail.com](mailto:ralphasil@gmail.com)  
530 277 2039 (c)







Rise Grass Valley Inc.  
333 Crown Pt Circle, Ste 215  
Grass Valley, CA 95945 USA

February 11<sup>th</sup>, 2022

[REDACTED]  
[REDACTED]  
Grass Valley, CA 95945

Mr. [REDACTED],

The Idaho-Maryland Mine Project proposes reopening the Idaho-Maryland underground mine with facilities constructed on the Brunswick Industrial site located south-west of the Brunswick Road and E. Bennett Road intersection. Nevada County has recently issued (January 4<sup>th</sup>, 2022) a Draft Environmental Impact Report (the "DEIR") for the Idaho-Maryland Mine Project. Rise has reviewed this document in detail over the last month and we are reaching out to you to provide further information on our project.

Rise Grass Valley Inc. (Rise) is the owner of the mineral rights, starting 200 feet and deeper beneath your surface property including all necessary and convenient rights to extract them, excepting the right of entry to the surface land. To access its mineral estate, Rise must first dewater the underground mine, and because your property is on a well, extensive research and modeling by certified, licensed hydrogeologists took place to assure us, the County and you how your well might be affected. While Rise does own the mineral rights deeper than 200 feet below the surface, Rise respects your surface property rights and is committed to being a good neighbor and community member. Out of an abundance of caution, Rise plans to provide you the option to connect to NID water at Rise's expense.

The hydrogeologic analysis was peer-reviewed by an independent California-licensed hydrogeologist. The County has determined that no domestic water wells will be drained by mine dewatering. The County has determined, using a safety factor of 100%, that several wells in the East Bennet Road area could be impacted by a reduction in the water column of wells ranging to a maximum of 10 feet. It should be noted that the water level in the existing mine workings is already approximately 100 feet below the depth of groundwater in your area, which illustrates that the mine is not hydrologically connected by significant fractures to the shallower groundwater well due to the impervious nature of the surrounding rock. Nevertheless, to ensure that you have 100% confidence in an uninterrupted access to water, Rise has committed to construct, at its own cost, an extension of the Nevada Irrigation District (NID) potable water system along E. Bennett Road which could service your property if you choose. This construction and connection would take place before any mine dewatering commences. Thus, you will have the option of either connecting to NID water, at Rise's cost, and/or continuing to use your domestic well. The County has determined that there is no threat to water quality to domestic water wells from the Idaho-Maryland Mine Project. Water does not flow upward from the mine







workings to feed your well, and as the water in the mine workings is removed, that would continue to be the case.

If you decide to utilize NID potable water, Rise will fund the connection to your property. The value per property owner, including capacity charges, is **estimated at approximately \$85,000**. Rise would also pay for your ongoing water charges as long as you own your property. A high-quality water supply from NID would alleviate your ongoing treatment and monitoring of your current well. In addition, this water supply is reliable and not interrupted during our area's increasingly frequent power outages.

If requested by the landowner at the time of NID connection and service to their properties, Rise will pay to close property owners' wells using certified well drillers and under Nevada County regulations.

If the Nevada Board of Supervisors approves the project, we will proceed with the detailed design of the potable water line. We will consult with you about your preference in meter location and desire to connect to the NID potable water system.

The Idaho-Maryland Mine Project also has direct benefits to fire protection for your property. The extension of the water pipeline along E. Bennett Road will allow for installing of fire hydrants and allow firefighters to respond to fires in your area much more efficiently. Rise has also agreed to provide Ophir Hill Fire Protection District with a new fire engine and additional firefighters which will significantly enhance their ability to provide excellent service in your area.

Your property is over 1/2 of a mile away from the Brunswick site, and **it would not be impacted** by noise during operations. Rise will not route truck traffic along E. Bennett Road adjacent to your property. Technical analysis, performed by an expert PhD, shows that the anticipated vibrations from drilling and blasting underground are negligible, and in almost all situations, drilling and blasting will be unnoticeable and undetectable.

Rise recently engaged RCLCO Real Estate Consulting, a highly respected firm, on the potential effect of the Idaho-Maryland Mine Project on local real estate values in the local area. RCLCO found **no negative impact on home prices** based upon case studies or recently opened mines. However, due to demand created by employment, homes sold closer to a mine actually achieve **higher pricing** than those sold farther away. We believe the extension of NID water service will increase the value of your property, as will the economic impact of the 300+ high-paying jobs and approximately **300 indirect jobs** that the project will create.

You can learn more about the Idaho-Maryland Mine Project at [www.risegrassvalley.com](http://www.risegrassvalley.com) and our company at [www.risegoldcorp.com](http://www.risegoldcorp.com). If you are interested in more information, have any concerns, or wish to support our project please contact me and I would be pleased to arrange a





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meeting in our Grass Valley office or at the Brunswick site. If you would like to meet in person or speak further about our project and the proposed NID water service, please contact me by phone or email as below.

Sincerely,

Ben Mossman  
President, Rise Grass Valley, Inc.  
CEO, Rise Gold Corp.  
(530) 433-0188  
info@risegoldcorp.com



## **INDIVIDUAL LETTER 663: RALPH SILBERSTEIN**

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### **Response to Comment Ind 663-1**

The commenter references a letter sent out by the applicant, which is included as an attachment. The applicant's dissemination of materials to the community is irrelevant to the County's independent and objective DEIR process. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 663-2**

The commenter references language in the attachment regarding the lack of well impacts associated with the project. Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, which accurately presents the findings of the DEIR regarding well impacts.

### **Response to Comment Ind 663-3**

The DEIR and this Final EIR accurately present the County's findings with respect to the environmental review of the proposed project. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 664**

To: Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902  
(530) 265-1423

From: Ray Bryars. 11574 Northview Drive, Nevada City, CA 95059  
Email: raybryars@yahoo.com

Subject : Questions & Comments related to the Idaho-Maryland Mine Project DEIR

Date: 3/30/2022

Via email: [Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

Dear Matt

**Ind 664-1**

I have reviewed section 4.7 - Hazards and Hazardous Materials section of the DEIR and was shocked at how they could possibly conclude that there are "No Significant issues". These are explosives materials and chemicals, they are addressing, how could there not be significant issues?

**Nearest Airports (page 4.7-10)**

Nevada County Airpark is only 4000 feet from the proposed Brunswick Industrial Site, with planes flying over on a regular basis.

**Ind 664-2**

It notes that the Nevada County Air Park is a "small aircraft airport" this is a disgraceful misleading statement that demeans the importance of the airport to protecting a number of communities. This airport is critical for the CALFIRE Grass Valley Air Attack Base. It is the permanent base for two Grumman S-2 Air Tankers that drop fire retardant, along with two Air Attack aircraft that coordinate the efforts of the Tankers. These planes protect a large portion of Nevada and adjacent counties during fire season. If anything were to happen to impede the ability of these and other firefighting planes to take off and land during critical firefighting periods, there could be horrendous impacts to our infrastructure and to the lives of many residents, businesses, employees and visitors. The airport is vital to the safety, vitality and future of Nevada County.

**Question:** Why would Rise Gold blatantly Lie about the value of the airport?

**Question:** How could the danger to this valuable asset ever be mitigated?

**Question:** Doesn't there need be special notification to pilots about the location of the mine and the possibility of emissions, explosions, plumes of air that might cause turbulence?

**Question:** When transportation of explosives is occurring within the flightpath, shouldn't all flights be stopped?

**Question:** Since the airport is crucial to the safety of our community during the fire season, shouldn't all transport of explosives be banned during fire season?



<b>Ind 664-3</b>	<p><b>Emergency Response and Evacuation (Page 4.7-10)</b> This section discusses guidance for evacuation orders, warnings, etc. <b>Question:</b> Will law enforcement be fully trained to respond to explosions? <b>Question:</b> What if an explosion levels the buildings and cuts off any ability to contact law enforcement. How will the neighboring residents and businesses know what to do? <b>Question:</b> Will all neighbors within a possibly impacted area be notified that they are living close to a site that is using dangerous explosives? <b>Question:</b> Will the properties in the danger zones be provided with compensation for the danger that they will constantly be exposed to? <b>Question:</b> Will the property owners in the danger zones be provided with compensation for the reduced value of their properties? <b>Question:</b> Will property taxes be reduced for properties that are close to the Brunswick location where the explosives will be used? <b>Question:</b> Will anyone proposing to purchase or sell a property within an area that could be impacted by explosions or hazardous materials be notified of the dangers?</p>
<b>Ind 664-4</b>	<p>On page 4.7-11 it mentions that the Greenhorn Road area would likely have several Zone Haven zones because it is a relatively large area. <b>Question:</b> Are there any other areas in Nevada County that have or will have Zone Haven zones due to their proximity to the hazardous materials at the mine site?</p>
<b>Ind 664-5</b>	<p><b>Section 4.7.3</b> <b>Occupational Safety and Health Act (page 4.7-12)</b> There is discussion about the training requirements. <b>Question:</b> Can it be assured that all personnel will be adequately trained prior to any hazardous materials being brought to the site?</p>
<b>Ind 664-6</b>	<p><b>Question:</b> Is the County able to ensure that the proper training takes place? <b>Question:</b> Is the County adequately staffed to be able to monitor and enforce adherence to a Hazardous Materials safety program? <b>Question:</b> Will the applicant be required to provide a detailed project timeline that included critical safety milestones, prior to any approval for the project to be started? <b>Question:</b> Is the County Building Department able to verify that any buildings meet appropriate hazardous materials construction requirements?</p>
<b>Ind 664-7</b>	<p><b>Question:</b> Who will pay for all the regulatory costs associated with transporting, handling and housing hazardous materials? <b>Question:</b> Given the size of this project and the proposed 80 year operation. Will there be any costs to the County that taxpayers will need to cover?</p>
<b>Ind 664-8</b>	<p><b>Question:</b> What steps will be taken to ensure that the Brunswick Mine site will not become a toxic waste site like the Centennial Site?</p>
<b>Ind 664-9</b>	<p><b>Question:</b> Will a very large Security Bond be required to ensure that the applicant will not run off and or declare bankruptcy if there are problems? Please note there is a history of the applicant doing exactly this in Canada. <b>Question:</b> If there is an explosion and hazardous materials are spread to surrounding neighborhoods, who will pay for the cleanup costs? Who will pay for inconvenience and housing for residents while the properties are cleaned up? Who would be liable if heaven forbid, someone is killed or injured?</p>





- Ind 664-10** **Nevada County General Plan (page 4.7-17)**  
This section is misleading. It makes it appear that adding hazardous substances into the community fits into the General Plan. No it doesn't - The General Plan does not, nor should it, add more hazards to our community. This is very sleazy!  
**Question:** If there is a hazardous waste cleanup situation caused by the mine in Nevada County, who pays for it?  
**Question:** Why would the County approve any project that would present a hazardous waste cleanup risk?  
**Question:** Given that any hazardous situation could result in road closures or flight cancellations. Who would pay for the cost to businesses and residents?
- Ind 664-11** Policy HM-10.5.5 states that The County will actively promote clean-up or remediation of properties contaminated by mine waste or other hazardous materials .....  
**Question:** If this is the case then why do we still have numerous BrownField sites in Nevada County?  
**Question:** Since there are numerous BrownField sites related to mining, that have not been remediated, why are we even thinking about approving another potential disaster site? Let's make it a County Policy not to approve any mine until all Brownfield sites are remediated.
- Ind 664-12** **Nevada County Environmental Health Department (NCEHD) (page 4.7-18)**  
It discusses that the NCEHD is (amongst other things) responsible for implementing the hazardous materials storage, hazardous materials management plans and risk management plans.  
**Question:** Is the Health Department staffed and trained to handle the huge risks of thousands of pounds of explosives being moved into and stored in our community?  
**Question:** Does the Health Department have the budget to handle these additional responsibilities?
- Ind 664-13** **Nevada County Emergency Operations Plan (EOP) (page 4.7-18)**  
It refers to the EOP that delineates responsibilities of first responders (fire and Law) and other response support organizations. It discusses evacuation plans that would be needed as well as Standardized Emergency Management Systems (SEMS) and Comprehensive Preparedness Guidelines (CPG).  
**Question:** How many other businesses require a reference to an EOP or SEMS or CPG?  
**Question:** Does the community want or deserve to have a business that has to reference an EOP, an SEMS or a CPG? The Mine site could be used for many other businesses, organizations or activities that are of benefit to the community - Not one that brings the need for Emergency Operations Plans.
- Ind 664-14** **Section 4.7.4 (note number appears out of sequence) Impacts and Mitigation Measures (page 4.7-19)**  
**Standards of Significance (page 4.7-19)**  
In accordance with CEGA Guidelines Appendix G, and impact is considered significant if the proposed project would:  
Then there is a bullet item list of areas that are considered significant. each of the issues should be enough to deny the project. I will list only one:



- "This includes: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or or public use airport, would the project result in a safety, hazard or excessive noise for people residing or working in the project area."

**Question:** With the Nevada County Airport less than 2 miles from the Brunswick site. This is obviously a SIGNIFICANT issue that cannot be remediated. Shouldn't this alone require the DEIR to be updated or completely stop the project?

**Question:** After this list the DEIR says nothing to deny that all items are SIGNIFICANT, the paragraphs following the list totally ignore the list and make no effort to discuss mitigation. Shouldn't this require the applicant to completely revise the DEIR to address how to mitigate each issue?

**Section 4.7-1 (page 4.7-22)**

**Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials. Based on the analysis below, with implementation of mitigation, the impact related to the transpiration, storage and use of hazardous materials is considered less than significant.**

**Question:** This contradicts the conclusion on page 4.7-31 which states "it is conservatively concluded that the proposed project could result in a **significant** impact to the routing transport, storage and use of explosives. Why the discrepancy?

**Question:** Why doesn't this shut down the whole project?

**Question:** The transportation route is not spelled out. Shouldn't the property owners along the route be specifically notified and given the opportunity to voice their concerns?

**Question:** Why should the County approve a project that could impact the safety of the residents?

**Section 4.7-1 (page 4.7-22)**

**Explosives (page 4.7-23)**

In table 4.7-1 it lists a number of types of explosives some of which need to be transported and stored separately. It is obvious that the management of these explosives is a non-trivial task that will require highly qualified staff 24/7/365. It is extremely important since this is a highly technical, highly detailed duty that will require much oversight.

**Question:** To ensure safety in the community, shouldn't the details of this process and the staffing qualifications be spelled out for review, prior to any approvals by the Supervisors?

**Question:** Shouldn't the details of the training requirements for anyone handling explosives be spelled out?

**Question:** Shouldn't the details of the oversight of the explosives storage be spelled out?

**Question:** Why is there no reference to the "AMERICAN TABLE OF DISTANCES FOR STORAGE OF EXPLOSIVES AS APPROVED BY THE INSTITUTE OF MAKERS OF EXPLOSIVES AND REVISED JUNE 1991"? This should be used as the Bible for explosive storage and distances from Public Highways. Distances from Brunswick Road and East Bennet Street should be spelled out.

**Question:** Shouldn't the training of local emergency responders to a situation regarding hazardous materials be spelled out?

**Question:** Shouldn't staffing requirements of 24/7/365 for local fire departments, hospitals, etc be spelled out?

**Question:** The current Brunswick sites is not securely fenced. I have seen people casually breach the fencing a number of times. Will the fencing and perimeter security be spelled out in

Ind 664-15

Ind 664-16

Ind 664-17





- ↑ detail and will the ability to maintain a high level of security 24/7/365 for 80 years be a requirement?  
**Question:** Will the applicant's ability to fund and maintain a high level of security for 80 years, be determined prior to any thought of allowing this project to move forward?  
**Question:** Will a very large bond be required along with annual compliance requirements that allow for complete closure of the site if there are any serious non-compliance issues?
- 
- Explosive Storage**  
On page 4.7-28 it specifies that "no mining is proposed closer than 500 feet to surface; thus explosives in transit would be at least this far from the surface." This is a ridiculous statement since the explosives have to be in transit from wherever they are manufactured to Grass Valley and then once at the mine site, they would be in transit to the 500 foot level.  
**Question:** Why is Rise Gold making these obviously misleading statements? Explosives will be required for construction of a new axes shaft, reclamation of existing mine works and development of storage areas, etc. Doesn't the omission of details indicate that there is a SIGNIFICANT impact that can't be mitigated?  
**Question:** Where will explosives and other hazardous materials be stored prior to transit to the 500 feet from the surface level?
- On page 4.7-27 it specifies that no mining is proposed closer than 500 feet from the surface; thus explosives in transit would be at least this far from the surface. Again, a ridiculous statement. At this point it is not known what impediments will be found in the mineshaft. It has been decades since anyone has been into the mine, so there could be huge blockages that will require explosives to blast through.  
**Question:** Why is Rise Gold giving misleading information? Can they guarantee that no explosives will ever be used above 500 feet below ground level?
- 
- \*\*Proximity to roads**  
The American Table of Distances for Storage of Explosives as approved by the institute of makers of explosives and revised June 1991. Spells out the distances explosive materials should be from public highways.  
**Question:** Will this be adhered to and will there be extra precautions required due to the proximity of Brunswick Road and East Bennet to the areas where explosives will be stored?
- 
- Explosive Transport (page 4.7-24)**  
On page 4.2-24 it states that Hauling of explosives would occur using Brunswick Road to State Routes (SR) 20/49.....  
**Question:** Exactly what are the details of the routes that the explosives take on the way to the Mine? Will this be through business districts or residential areas? What security will there be? We have all been made aware of catastrophic explosions caused by the same explosives that Rise Gold intends to use. These explosions have caused the death of thousands of people and obliterated hundreds of homes.  
**Question:** This route is extremely close to the Nevada County Airport? Will there be restrictions to flights during explosives transport?  
**Question:** What will happen during fire season when planes need to rapidly access the airport to protect the community?  
**Question:** Will Rise Gold be required to post a multi-million dollar bond in case something goes wrong?  
If the answer is no. Why not?
- ↓

Ind 664-18

Ind 664-19

Ind 664-20



Ind 664-21

**Question:** If there is an explosion, will trained resources be available to communicate with the community and evacuate residents as required? It is well know that along Sutton Way, close to Idaho-Maryland Road, there are senior care facilities that would require a massive evacuation response.

**Question:** Will trained personnel be available 24/7 to take care of these people in an emergency?

On page 4.7-23 It states that :<sup>17</sup> "The handler or an employee authorized representative agent, or designee of the handler shall provide all state, city or county response personnel with access to the handler's facilities. In the case of the proposed project the contractors are required to notify the NCEHD (Nevada County Environmental Health Department) in the event of an accidental release of a hazardous material, who would then monitor the conditions and completion of remediation measures."

**Questions:** Where are the handler's facilities? Is this the mine? If there is an explosion or hazardous release on Brunswick Road or in the Glenbrook Basin, what steps would be taken to evacuate hundreds of people? Will the NCEHD be staffed to respond 24/7/365 for 80 years, if there were an emergency? What training does the NCEHD have for handling explosives? Will there be trained personnel available 24/7/365/80 to respond to incidents?

**Question:** Are there plans to train NCEHD personnel for explosive related incidents? When will training take place and at what intervals?

Ind 664-22

On page 4.7-26 there is reference to a maximum of 28,000 pounds of explosives would be stored underground at any given time. Prior to that statement it specifies that 0.93 tons of explosives would be used each day. Since there are 2000 pounds in a ton, that infers that the explosives would need to be replaced approximately every 15 days. This means that a truck carrying 28000 pounds of explosives would be taking the off ramp from Highway 20/49 at Brunswick Road and driving through very heavily used intersections on the way to the Brunswick site. This would occur throughout the year, which means possible transportation through wind, rain or snow conditions, not to mention the very high probability of traffic accidents over time. If there is another transit route, it should be spelled out.

**Question:** The two Intersections along Brunswick at Idaho Maryland Road and Loma Rica Drive are extremely close (less than 1/2 mile) to the Nevada County Airport. Should a valuable asset like the airport be subject to these explosion risks? There was a recent fatal accident close to Loma Rica Drive. What would happen if explosives were involved?

**Question:** Is the developer of the Loma Rica housing project aware of the possibility that explosives will possibly be transported along Brunswick Road, past the development?

**Question:** Can it be confirmed that the developer will be required to disclose details of the hazards of the mine and transport of hazardous materials to potential property owners?

**Question:** Will the developer of the Loma Rica housing project be required to notify property owners of the probability that explosives will be used under their homes?

**Question:** Will all Realtors be required to notify all potential buyers of property above or within a mile of the mine be required to disclose that explosives will be transported close to their homes and potentially used under their homes?

**Question:** Does it make sense to be transporting huge amounts of explosives, causing a community like Grass Valley to be subject to the risks of the huge explosive damage that Ammonium Nitrate can cause? We see situations almost weekly where large communities have been evacuated due to the threat of explosions. Recently there was an uncontrolled fire in a North Carolina fertilizer plant. Is this a risk that our community deserves?





- Ind 664-23
- On Page 4.7-28 it states that "Blasting activities are proposed to take place twice daily with blasting between shifts at 7AM and 7PM ....."
- Question:** Will the property owners of the new Loma Rica Housing Development be made aware of these blasting activities? The explosions could be directly below hundreds of properties.
- Question:** Will current property owners on Sutton Way be notified of these blasting activities? There are people with fragile health conditions in some of the health facilities in this area. The blasting may impact their health.
- Conclusion (page 4.7-30)**  
It states that: "compliance with applicable federal, State and local regulations would "minimize" the potential for the proposed project to result in a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials."
- Question:** Why would the county knowingly subject its residents to ANY risk? We all know that humans make mistakes and accidents happen. If this project is approved it is almost a certainty that a disaster will happen. We have examples almost every week of explosions with the chemicals that are proposed for use at this site. Recently an Ammonium Nitrate plant in North Carolina burned out of control for a 3rd day, 6000 people were evacuated and it is projected to be one of the worst explosions in US history. Does Nevada County need to take a similar risk? I urge you to say NO.
- Then on page 4.7-31 it states "It is conservatively concluded that the proposed project could result in a **significant** impact related to the routine transport, storage and use of explosives."
- Question:** Why should the community of Grass Valley subject its residents to these risks? It makes no sense, for any period of time, let alone the proposed 80 years?
- Question:** Why do previous sections conclude that "there is no significant risk" this is disgracefully misleading.
- Ind 664-24
- Mitigation Measures (page 4.7-31)**  
States that "The mine operator shall prepare a Risk Assessment when the underground mine is accessible..... The Risk Assessment shall be performed by a qualified professional .....The Risk Assessment shall demonstrate protection of the public from hazards of explosive storage and be provided too the Nevada County Planning Department before underground storage of explosives.
- Question:** Does the Planning Department have the staff and the expertise to address safety issues with explosives? If not who does?
- Question:** What is the timeframe for the Risk Assessment? Shouldn't this be part of the DEIR?
- Ind 664-25
- Page 4.7-31, 4.7-1(c) The mine operator ..... Proof of the agreement between ..... Shall be provided to the Nevada County Planning Department before transporting explosives to the site.





Ind 664-26

↑ **Question:** Does the Planning Department have the staff and the expertise to address explosive transportation issues? If not who does?

Page 4.7-31, 4.7-1(d) Prior to the transport, storage, or use of hazardous materials or explosives at the site, the mine operator shall prepare a Hazardous Materials or explosives at the site, the mine operator shall prepare a Hazardous Materials Business Plan (HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials or explosives on-site.

**Question:** Is there anyone with the experience and expertise on County Staff who could do this? If not, what is required to hire and retain staff with the appropriate skills?

**Question:** Shouldn't the Hazardous Materials Business Plan be part of the DEIR?

**Question:** Who will pay for the costs associated with this?

#### **Cumulative Impacts And Mitigation Measures (page 4.7-39)**

##### **Section 4.7-5**

Page 4.7-39 it states:

"In general, hazardous materials and other public health and safety issues are site specific and project specific and would not be significantly affected by other developments within the project area."

**Question:** How is this possible when on page 4.7-31 it states "It is conservatively concluded that the proposed project could result in a **significant** impact related to the routine transport, storage and use of explosives." They are contradicting their own statements.

Also on page 4.7-39 it states:

"this EIR concludes that compliance with applicable federal and state regulations, such as MSHA, OSHA, and CCR, as set forth in Mitigation Measures 4.7-1 (a-d), would ensure that the explosive hazards associated with the ongoing operation of the proposed project should not combine with other cumulative projects to create significant related hazard impacts, and the cumulative impact would be **less than significant**."

**Question:** Shouldn't the compliance process be documented in detail to show all the interacting agencies and how they interface with the employees of the mining company? Details should show the costs to each organization and who is responsible for the costs. If any of these costs are carried by the County or any residents in the county, this should be clearly specified so that those responsible for allowing this project to move forward are made fully aware of who is really paying the bill.

**Question:** Is there an agency in County Government responsible for vetting the track record of anyone proposing to reopen a mine to ensure that reasonable attempts have been made to protect the residents from another Siskon Mine, Magenta Drain or Lava Cap Brownfields site problem?

**Question:** How can any of the statements in this DEIR be trusted until the applicant has been vetted?

Ind 664-27



## **INDIVIDUAL LETTER 664: RAY BRYARS**

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### **Response to Comment Ind 664-1**

The commenter disagrees with the DEIR's findings that the impacts discussed in Chapter 4.7 pertaining to hazardous materials could be mitigated to less than significant. The commenter does not specifically state how the DEIR is inadequate. Section 4.7.4 of the DEIR describes the standards of significance and methodology used to analyze and determine the project's potential impacts related to hazards and hazardous materials. As discussed in Section 4.7-1 on pages 4.7-22 through 4.7-31 of the DEIR, with implementation of mitigation, the impact related to transportation, storage, and use of hazardous materials is considered less than significant. As discussed in this section of the DEIR, the transportation of explosives is heavily regulated and the transportation of explosives in the United States has an excellent safety record. Transportation, storage, and use of explosives used in furtherance of the project would be required to comply with applicable federal and State laws at all times. Compliance with such would help to ensure that a significant hazard to the public or the environment through the routine transport, use, or disposal of explosives would not occur. The commenter is also referred to Master Response 10 - Explosives, Reagents, and Brunswick Fill.

### **Response to Comment Ind 664-2**

The commenter states that the project will impede the operations of the nearby Nevada County Airport but does not provide specific reasons as to how the DEIR is inadequate in this regard. Page 4.7-10 of the DEIR discusses the Nevada County Air Park, a small aircraft airport, located less than one mile from the Brunswick Industrial site. The commenter is offended by the description of the airpark as a "small aircraft airport" but provides no information on how this description is related to the adequacy of the DEIR. Information on the Grass Valley Air Attack Base is provided on page 4.13-8 of the DEIR. Furthermore, the Nevada County Airport has a single runway that is aligned east to west. The runway is 4,350-feet long and 75 feet wide and designated as Runway 7-25. The Airport Reference Code (ARC) classification for the airport is ARC B-I (Small). This means the airport is used primarily by aircraft with approach speeds lower than 121 knots, wingspans less than 49 feet, and weighs less than 12,500 pounds. However, the airport is capable of accommodating larger and heavier aircraft at the pilot's discretion. The designated design aircraft is the twin-engine Cessna 421. (Nevada County Airport Land Use Compatibility Plan, p. 3-2 (<https://www.nctc.ca.gov/documents/NCALUC/NCALUCP%20Final%209-21-11%20-%20Chapter%203%20-%20Background%20Data.pdf>).

The commenter asks how the danger to the airport can be mitigated and suggests special notifications on project activities, halting of flights during explosives transportation, and banning of explosives transportation during fire season. As stated on page 4.7-10 of the DEIR, according to the Nevada County General Plan EIR, land uses that could create hazards related to airport operations at the Nevada County Air Park include objects that exceed Federal Aviation Regulations Part 77 height standards, attract large concentrations of birds within approach/departure sectors, produce smoke, flash or reflect light, or generate electronic interference. As stated on page 4.7-36 of the DEIR, the project site is partially within Zones D and E of the Nevada County Airport Land Use Compatibility Plan (NCALUCP). For Zone D, airspace review is required for objects at elevations above 3,207 feet mean sea level (msl). The tallest point of the project site (the 165-foot-tall headframe building) would be at 2,912 feet msl. In addition, the project is not a noise-sensitive use, would not pose a hazard to flight, and would not exceed the density requirements; therefore, the project would comply with the requirements of the NCALUCP for Zones D and E. The project would not create smoke, moisture clouds, or



turbulence that would affect aircraft (see Response to Comment Grp 7-95). Implementation of Mitigation Measure 4.7-1 (a-d) would minimize risk, including to the Nevada County Airpark, from transport of explosives to a less than significant level.

### **Response to Comment Ind 664-3**

The commenter asks if law enforcement will be adequately trained to respond to explosions. The training of law enforcement and fire district personnel is the responsibility of those respective organizations. Law enforcement is trained to deal with a variety of mass casualty and critical incidents including bombs and explosions. In addition, the law enforcement mutual aid system is implemented if a critical incident overwhelms local knowledge or resources.

Mitigation Measure 4.7-1(d) requires that prior to the transport, storage, or use of hazardous materials or explosives at the site, the mine operator shall prepare a Hazardous Materials Business Plan (HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials or explosives on-site. The HMBP ensures that emergency response agencies, including fire and police, have access to current data including types of chemicals, quantities, maps of chemical locations, and evacuation assembly areas (see <https://www.nevadacountyca.gov/2179/Hazardous-Material-Business-Plan>).

The commenter asks what if an explosion levels a building and cuts off any ability for communication with law enforcement and suggests a notification and compensation program to neighbors within a possibly impacted blast area. With implementation of mitigation, the impact related to transportation, storage and use of hazardous materials is considered less than significant. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.”

Regarding the compensation program for reduced property values, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 664-4**

The commenter asks whether any Zone Haven evacuation zones will be designated near hazardous materials at the project site. The mine site can be its own zone. This is achieved relatively easily and the remaining zones would have the same numbers they currently have.

### **Response to Comment Ind 664-5**

In accordance with MSHA regulations, section 48.5, each new miner shall receive no less than 40 hours of training as prescribed in this section before such miner is assigned to work duties. Such training shall be conducted in conditions which as closely as practicable duplicate actual underground conditions, and approximately 8 hours of training shall be given at the minesite. Training includes but is not limited to the recognition and avoidance of hazards present in the mine, particularly any hazards related to explosives where explosives are used or stored at the mine; and the health and safety aspects of the tasks to be assigned, including the safe work procedures of such tasks, the mandatory health and safety standards pertinent to such tasks, information about the physical and health hazards of chemicals in the miner’s work area, the protective measures a miner can take against these hazards, and the contents of the mine’s HazCom program. Records of employee training shall be made available to MSHA personnel during mine inspections.



### **Response to Comment Ind 664-6**

Please see Response to Comment Ind 664-5.

### **Response to Comment Ind 664-7**

The commenter asks about the regulatory costs of the project. This comment does not pertain to the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 664-8**

The commenter asks how the project will ensure the Brunswick Site will not require a remediation cleanup plan like the Centennial Industrial Site. This comment does not pertain to the adequacy of the DEIR. The commenter is referred to Master Response 8 - Mine Waste Characterization and Master Response 9 - Historical Mine Waste at Centennial Site.

### **Response to Comment Ind 664-9**

The commenter asks if there will be a security bond in place for the project. The commenter also asks who will pay the cleanup in the event of an explosion. These comments do not pertain to the adequacy of the DEIR. As stated on page 4.6-24 of the DEIR, to ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan.

Minimum levels of financial responsibility for motor carriers transporting hazardous substances are provided in 49 CFR 387 (see <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-387>). The commenter is also referred to Table 4.7-2 of the DEIR, which details federal regulations for the transport of explosives. In regards to comments on the Project Applicant's reputation, the commenter is referred to Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 664-10**

The commenter states that page 4.7-17 of the DEIR misleadingly finds that Nevada County's General Plan allows for explosives to enter the County. The DEIR is not misleading, it simply references the applicable provisions in the General Plan that govern the County's approach to hazard and disaster response preparedness.

The Project Applicant would be responsible for any hazardous waste cleanup caused by the project. Motor carriers transporting hazardous materials would be responsible for hazardous waste cleanup caused during transport. Minimum levels of financial responsibility for motor carriers transporting hazardous substances are provided in 49 CFR 387 (see <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-387>). The commenter is also referred to Table 4.7-2 of the DEIR, which details federal regulations for the transport of explosives.

The commenter states that the project presents a hazardous waste cleanup risk and that a hazardous situation could result in road closures or flight cancellation and suggests a compensation to affected business and residences. The comment does not pertain to the adequacy of the DEIR. As discussed in Section 4.7-1, on pages 4.7-22 through 4.7-31 of the DEIR, with implementation of mitigation, the impacts related to the highly regulated transportation,





storage and use of hazardous materials is considered less than significant. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, “[a]rjument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.” Regarding economic issues the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 664-11**

The commenter suggests a modification of the Nevada County General Plan and remediation of all brown fields mining sites in Nevada County before approval of any mine. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 664-12**

The commenter asks if Nevada County’s Environmental Health Department will be adequately staffed and trained to enforce the project’s Hazardous Materials Business Plan. This comment does not pertain to the adequacy of the DEIR. Regarding the Project Applicant’s enforcement of mitigation measures and conditions of approval, a mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other local, state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 664-13**

The commenter references Nevada County’s Emergency Operations Plan (EOP), the Standardized Emergency Management System (SEMS) and FEMA’s Comprehensive Preparedness Guide (CPG) and whether other business are subject to these plans and guidelines. The documents referenced by the commenter are emergency operations plans to be used by the County for natural disasters and manmade emergency incidents. DEIR page 4.7-18 provides additional information on the Nevada County Emergency Operations Plan. The purpose of this section of the DEIR is to provide a summary of regulatory control pertaining to hazardous materials. A CEQA document for other projects would provide similar information. The comment does not address the adequacy of the DEIR and requires no further response.

### **Response to Comment Ind 664-14**

The commenter states that the project’s vicinity to the Nevada County Airport is a significant impact and should be sufficient not to approve the project. As stated on page 4.7-36 of the DEIR, the project would not result in a safety hazard or excessive noise for people residing or working in the project area related to the Nevada County Air Park. Therefore, impacts related to airport safety hazards and noise would be less than significant. Please also see Response to Comment Ind 664-2.

### **Response to Comment Ind 664-15**

The commenter states that the DEIR’s discussion of Impact 4.7-1 contradicts itself by stating the impact would be less than significant, but concludes the impact is significant. The DEIR does not contradict itself. As stated on page 4.7-31 of the DEIR, it is conservatively concluded that the proposed project could result in a significant impact related to the routine transport, storage, and use of explosives. Implementation of the mitigation measures 4.7-1(a) through 4.7-1(d) would minimize the risk from transport, underground storage, and use of explosives at the Brunswick Industrial Site, to a less-than-significant level.





The commenter also states that the DEIR fails to identify the transportation route for delivery of explosives and is concerned about the safety risks of transporting explosives through the community. As stated on page 4.7-24 of the DEIR, hauling of explosives would occur using Brunswick Road to State Routes (SR) 20/49. Explosives would be transported directly to the site by licensed explosive suppliers that possess the requisite permits, including a CHP hazardous materials transportation license and U.S. DOT hazardous materials permits. State Routes 20 and 49 are designated as explosive transport routes by the CHP. The DEIR analyzed the transport, storage, and use of explosives in DEIR Chapter 4.7 and found the impacts to be less than significant after mitigation.

### **Response to Comment Ind 664-16**

The commenter states that the DEIR should include a reference to the American Table of Distances for explosives and the DEIR should discuss the training and qualification of both project employees who handle explosives and emergency responders. Regarding the training of emergency responders, the commenter is referred to Response to Comment Ind 664-3. The commenter is also referred to Chapter 4.11 of the DEIR which discusses Public Services.

Regarding the project's use of explosives, explosives are not proposed to be stored on surface. Contrary to the commenter's assertion, page 4.7-27 of the DEIR specifically refers to the American Table of Distances. As stated on page 4.7-27 of the DEIR, it is likely that locations of underground magazines, determined through the risk assessment, would be located further by connecting tunnels and shafts from surface than the distances specified in the American Table of Distances (ATD). It is worth noting that no fatalities or serious injuries have ever occurred within the distances specified by the ATD in the extremely rare events where a detonation of an explosive magazine has occurred.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other local, state and federal agencies, those agencies will be responsible for their enforcement.

Regarding economic issues, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

### **Response to Comment Ind 664-17**

The commenter is concerned about security issues at the Brunswick site. As stated on page 4.11-26 of the DEIR, in order to deter potential crime at the Brunswick Industrial Site, the property would be fenced and gated. A security officer would always be on-site to ensure controlled access to the mine. The commenter states that fencing and perimeter security details are required in the DEIR. However, engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.)

The commenter is also concerned about the bonding requirements for reclamation of the mine. As stated on page 4.6-24 of the DEIR, to ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan.



### **Response to Comment Ind 664-18**

The commenter states that, despite the DEIR's assertion otherwise, mining would occur within 500 feet of the surface. The paragraph referred by the commenter on page 4.7-28 of the DEIR discusses transportation of explosives from underground magazines to underground working areas and states "Explosives required for loading drift rounds or longhole blasts would be transported directly from the underground magazine to the working area and therefore explosives quantities in transit underground would be a maximum of approximately 500 pounds at any given location. No mining is proposed closer than 500 feet to surface; thus, explosives in transport would be at least this distance from the surface."

As stated on page 4.7-26 of the DEIR, upon delivery to the project site, explosives and detonators would be immediately transported underground to designated storage facilities and placed in separate magazines pursuant to federal OSHA and MSHA regulations, including 29 CFR 1926.904, subdivision (b) and 30 CFR 57.6102, and California regulations, including Title 8 CCR 5251, subdivision (a). The materials would not be stored above ground.

The commenter speculates that the Brunswick shaft may be blocked within 500 feet from surface and will require explosives to blast through. However, the applicant has inspected the shaft to this depth with an underwater vehicle and no such obstruction is present in the Brunswick Shaft. (see <https://www.risegoldcorp.com/uploads/content/feb20-risegoldbrunswicksurvey.pdf>) Lastly, a condition of approval for the project will require that no blasting, except for the construction of the service shaft, will be conducted closer than 500 feet below ground surface.

### **Response to Comment Ind 664-19**

The commenter asks if the distances specified in the American Table of Distances will be adhered to given the proximity to the Brunswick and East Bennett areas. Explosives are not proposed to be stored on surface. As stated on page 4.7-27 of the DEIR, it is likely that locations of underground magazines, determined through the risk assessment, would be located further by connecting tunnels and shafts from surface than the distances specified in the American Table of Distances (ATD). It is worth noting that no fatalities or serious injuries have ever occurred within the distances specified by the ATD in the extremely rare events where a detonation of an explosive magazine has occurred.

### **Response to Comment Ind 664-20**

The commenter lists a number of concerns pertaining to the transport of explosives. As stated on page 4.7-24 of the DEIR, hauling of explosives would occur using Brunswick Road to State Routes (SR) 20/49. Explosives would be transported directly to the site by licensed explosive suppliers that possess the requisite permits, including a CHP hazardous materials transportation license and U.S. DOT hazardous materials permits. State Routes 20 and 49 are designated as explosive transport routes by the CHP.

With implementation of mitigation, the impact related to transportation, storage and use of hazardous materials is considered less than significant. The commenter speculates that an explosion may occur which would impact senior facilities and suggests various training programs and bonding. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."



The commenter states that explosions have caused the death of thousands of people and obliterated hundreds of homes. However, as stated on page 4.7-25 of the DEIR, the transportation of explosives in the United States has an excellent safety record. A review of DOT incident reports for highway transportation of class 1.1B, 1.4B, 1.1D, and 1.5D materials shows 149 incidents over the past 30 years in the United States. The majority of these incidents were vehicle accidents resulting in no release or spillages. No fatalities were reported in any incidents and only 1 incident resulted in injuries.

Regarding comments on the airport and aircraft, the commenter is referred to Response to Comment Ind 664-2.

### **Response to Comment Ind 664-21**

The commenter raises questions regarding the handler's facilities in connection with explosives and the Nevada County Department of Environmental Health's role in handling explosives. In the context of the referenced paragraph on page 4.7-23 the "handler's facilities" are the Project Applicant's project sites.

In regard to explosions requiring evacuation of hundreds of people, the commenter is referred to Response to Comment Ind 664-20.

Nevada County Environmental Health Department employees would not handle explosives or be a first-responder to emergencies. As stated on page 4.7-23 of the DEIR, the NCEHD would monitor the conditions and completion of remediation measures. The commenter is referred to Response to Comment Ind 664-3 regarding training of emergency responders.

### **Response to Comment Ind 664-22**

The commenter raises a number of concerns regarding the transport of explosives through the community but does not comment on the adequacy of the DEIR. In regards to delivery schedule of explosives in relation to the analysis of explosives transport risk, the commenter is referred to Master Response 10 – Explosives, Reagents, and Brunswick Fill.

In regard to risk of explosions to the airport, the commenter is referred to Response to Comment Ind 664-2.

In regard to the Loma Rica housing development and property disclosures, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

With implementation of mitigation, the impact related to transportation, storage and use of hazardous materials is considered less than significant. Please see Response to Comment Ind 664-1.

The commenter asks whether property owners will be notified of blasting activities and states that blasting vibrations will affect the health of people with fragile health conditions. No such notification is necessary. As stated on page 4.10-58 of the DEIR, the project is not anticipated to result in the exposure of persons to or generation of excessive groundborne vibration levels. Nonetheless, out of an abundance of caution, in order to ensure that actual mining operations would generate vibration levels as expected, a Ground Vibration Monitoring Program is required. Without quantitative evidence and regular monitoring from the Ground Vibration Monitoring Program, a significant impact related to the generation of groundborne vibration could occur. Implementation of Mitigation Measure 4.10-4 would ensure the above potential impact is less than significant. Please also see Master Response 7 – Location of Future Mining.



### **Response to Comment Ind 664-23**

The commenter raises general concerns about the project's use of explosives. The commenter also states the DEIR contradicts itself by labeling an explosives-related risk as both significant and less than significant. As stated on page 4.7-31 of the DEIR, it is conservatively concluded that the project could result in a significant impact related to the routine transport, storage, and use of explosives. Implementation of the mitigation measures 4.7-1(a) through 4.7-1(d) would minimize the risk from transport, underground storage, and use of explosives at the Brunswick Industrial Site to a less-than-significant level.

The commenter states that almost every week explosions of chemicals that are proposed for use at the project occurs and cites a fire at an ammonium nitrate plant in North Carolina as evidence. However, the plant cited did not explode and a fertilizer plant is not proposed for the project. As stated on page 4.7-28 of the DEIR, the use of explosives in modern underground mines is made safe due to the many regulations and safety measures adopted in the United States. There have been only three incidents attributed to Explosives and Breaking Agents resulting in fatalities in the past 25 years (1995-2021) in all underground metal mines in the United States. Two of these incidents (2010 and 2011) were directly related to explosives and one of the incidents was related to CO poisoning from insufficient ventilation and was unrelated to explosives. None of the incidents presented a risk to the public from the use of explosives underground. As stated on page 4.7-25 of the DEIR, the transportation of explosives in the United States has an excellent safety record. A review of DOT incident reports for highway transportation of class 1.1B, 1.4B, 1.1D, and 1.5D materials shows 149 incidents over the past 30 years in the United States. The majority of these incidents were vehicle accidents resulting in no release or spillages. No fatalities were reported in any incidents and only 1 incident resulted in injuries.

The commenter believes the threshold of significance for hazards should be zero risk or a 100% certainty that residents are not exposed to any risk. However, CEQA does not require 100% certainty, as this could never be achieved. Rather, as stated by California Courts, “[t]he need for thorough discussion and analysis is not to be construed unreasonably... to serve as an easy way of defeating projects. Absolute perfection is not required.” (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376.)

### **Response to Comment Ind 664-24**

The commenter asks whether the Nevada County Planning Department has the expertise to address safety issues with explosives and states that the Risk Assessment should be in the DEIR. The U.S. Mines Health and Safety Administration (MSHA) is the regulator for underground mine safety, including the regulation of underground storage of explosives. As stated in Mitigation Measure 4.7-2(b), the Risk Assessment will be submitted to MSHA for their review. Regarding the inclusion of the Risk Assessment in the DEIR, explosives storage has been analyzed in the DEIR and an engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.)

### **Response to Comment Ind 664-25**

The commenter asks whether the Nevada County Planning Department has the expertise to review the agreement found in Mitigation Measure 4.7-1(c). The U.S. Department of Transportation regulates the transport of explosives through numerous regulations as described on pages 4.7-22 through 4.7-26 of the DEIR.

### **Response to Comment Ind 664-26**

The commenter asks whether the Nevada County Planning Department has the expertise to review the Hazardous Materials Business Plan and that the plan should be included in the DEIR.



Hazardous Materials Business Plans (HMBP) are routinely submitted for various project sites throughout the County under the requirement of CalEPA. (see <https://www.nevadacountyca.gov/2179/Hazardous-Material-Business-Plan>). The Project Applicant is responsible for preparing the HMBP. The HMBP shall be prepared prior to the transport of explosives and reviewed and approved by the County in accordance with Mitigation Measure 4.7-1(d).

### **Response to Comment Ind 664-27**

The commenter states that the DEIR's discussion of hazard-related impacts contradicts itself by labeling the same impact as both significant and less than significant. As stated on page 4.7-31 of the DEIR, it is conservatively concluded that the project could result in a significant impact related to the routine transport, storage, and use of explosives. Implementation of the mitigation measures 4.7-1(a) through 4.7-1(d) would minimize the risk from transport, underground storage, and use of explosives at the Brunswick Industrial Site to a less-than-significant level.

The commenter also requests that the DEIR includes a discussion on how the Project Applicant interacts with each applicable regulatory agency. CEQA does not require this level of detail. "The need for thorough discussion and analysis is not to be construed unreasonably... to serve as an easy way of defeating projects. Absolute perfection is not required." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 406.)

The commenter also questions the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility. Moreover, a mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other local, state and federal agencies, those agencies will be responsible for their enforcement.





**Individual Letter 665**

Ray Kinman

woodcarverguru@gmail.com, 530.277.5200

April 1, 2022

Matt Kelly, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959

Dear Matt,

It's hard to know where to begin, since there are so many areas of concern with the Rise Gold Mine.

So I will begin with introducing myself. My name is Ray Kinman, and I live and work off of Greenhorn Road. I moved to this beautiful area 13 years ago because of the beautiful, serene nature of it. If the mine were to be approved, it would dramatically alter the nature of our community to such an extent that I would no longer find it tolerable to live here. This is how deeply I feel about this.

I have reviewed the DEIR report, and what strikes me is that it is so completely out of line with what suits our community, and it so under-states the huge and long-term impacts that it would have on our community, as to border on the absurd.

Some of the **many** objections that I have to the mine are as follows:

**1) Surface and groundwater water impacts are inadequately addressed in the DEIR report.**

- a) Deir only has plans to address 39 wells, when there are potentially hundreds affected
- b) What impact would this have on the already extremely high forest fire hazard, and especially when we are in the midst of a multi-year drought?

**2) Visual impacts are unmitigated in the report**

- a) There would be what amounts to a skyscraper in our beautiful forest; engineered backfill off Brunswick that is 40+ feet tall; deforestation with minimal replanting of trees, and only along road corridors; the pristine nature of our dark nighttime sky would be gone.

**3) Traffic impacts would be huge, unmitigated, unavoidable**

**4) The mine runs counter to the need to reduce greenhouse gas emissions**

- a) As the residents of Nevada County strive to live in a more ecologically-conscious manner, the progress made would be obliterated by the additional greenhouse emissions by the mine.

Ind 665-1

Ind 665-2

Ind 665-3

Ind 665-4

Ind 665-5



Ind 665-6	<b>5) Explosives</b> would be brought to our community as they are transported, stored, and utilized on the mine site, bringing noise and the potential for accidents which could result in calamity.
Ind 665-7	<b>6) Air quality impact is inadequate in the report</b> a) We already score an F rating in terms of air quality, and mine emissions would only serve to worsen it.
Ind 665-8	<b>7) Clean-up of the Centennial site not included in the report</b>  Also – if it were to be approved, do we really want to open the door to other mining companies to come to our beautiful community and alter our lifestyles, scar our land, pollute our air, drain our water, fill the beautiful night sky with lights, fill the roads with traffic, and assault our ears with noise?
Ind 665-9	<b>I say most definitely NOT!</b>  Let's leave the charm of our community intact and our mining history quaintly in our past, where it belongs.  Sincerely,  Ray Kinman 12888 Lost Lake Road Grass Valley, CA



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## **INDIVIDUAL LETTER 665: RAY KINMAN**

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### **Response to Comment Ind 665-1**

This comment is introductory in nature and the commenter is opposed the project. The commenter's opposition is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

### **Response to Comment Ind 665-2**

The commenter states that the DEIR underestimates the number of groundwater wells the project would impact. The commenter also implies that the project's use of groundwater could exacerbate fire hazards. As stated on page 4.13-21 of the DEIR, it can be reasonably concluded that the dewatering of the mine would not affect the available moisture for vegetation in the project area because the depth to groundwater is already below the typical rooting depths in higher topographic areas, while adequate flows would occur in South Fork Wolf Creek and Wolf Creek to maintain groundwater levels in the lower topographic areas. The dewatering would not, therefore, increase fire risk due to reduced groundwater levels. The commenter is also referred to Master Response 33 – Groundwater Dependent Vegetation. Regarding groundwater, please also see Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

### **Response to Comment Ind 665-3**

The commenter states that the project would result in adverse impacts to aesthetics. The commenter also suggests the project would result in light pollution. The DEIR concludes that the project would substantially degrade the existing visual character or quality of public views of the project sites or the site surroundings and such impacts would be significant and unavoidable even after implementation of mitigation. (DEIR, p. 4.1-21–22.) Regarding light pollution, the DEIR concluded that the project would not create a new source of substantial light which would adversely affect day or nighttime views and that such impacts would be less than significant. (DEIR, p. 4.1-23.) Please see Chapter 4.1 of the DEIR regarding aesthetics impacts of the project.

### **Response to Comment Ind 665-4**

The commenter states that the project's traffic-related impacts would be "huge, unmitigated, [and] unavoidable" but does not provide additional detail. The DEIR found that all traffic-related impacts of the project would be less than significant after mitigation, with the exception of the impact to the intersections at Brunswick Road and State Route 174 (level of service impact) and Brunswick Road and Sutton Way (queueing impact), which would be significant and unavoidable even after implementation of mitigation. (DEIR, p. 4.12-56.)

### **Response to Comment Ind 665-5**

The commenter states that project would result in adverse impacts to air quality due to increased GHG emissions. The DEIR states that the project's GHG-related impacts would less than cumulative considerable. (DEIR, p. 4.3-92, 99.) Please also see Master Response 27 – Greenhouse Gas Thresholds.



**Response to Comment Ind 665-6**

The commenter is concerned about the project's transport, use, and storage of explosives at the Idaho-Maryland Mine. Chapter 4.7 of the DEIR analyzed explosives and found the impacts to be less than significant after mitigation. Please also see Master Response 10 – Explosives, Reagents, and Brunswick Fill. Regarding noise from use of explosives, please refer to page 4.10-44 of the DEIR, where the DEIR concludes that blasting noise would be below the County's applicable thresholds.

**Response to Comment Ind 665-7**

The commenter states that project would result in adverse impacts to air quality. The commenter is referred to Master Response 18 - Air Quality Thresholds.

**Response to Comment Ind 665-8**

The commenter states that the DEIR should include the remediation of the Centennial Industrial Site. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

**Response to Comment Ind 665-9**

The commenter states that the project should not be approved. The commenter's opposition to the project is noted for decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.









Ind 666-6

5) **Explosives** would be brought to our community as they are transported, stored, and utilized on the mine site, bringing noise and the potential for accidents which could result in calamity.

Ind 666-7

6) **Air quality impact is inadequate in the report**

a) We already score an F rating in terms of air quality, and mine emissions would only serve to worsen it.

Ind 666-8

7) **Clean-up of the Centennial site not included in the report**

Also – if it were to be approved, do we really want to open the door to other mining companies to come to our beautiful community and alter our lifestyles, scar our land, pollute our air, drain our water, fill the beautiful night sky with lights, fill the roads with traffic, and assault our ears with noise?

Ind 666-9

**I say most definitely NOT!**

Let's leave the charm of our community intact and our mining history quaintly in our past, where it belongs.

Sincerely,



Ray Kinman  
12888 Lost Lake Road  
Grass Valley, CA

Ind 666-10

P.S. I am very concerned about the impact the mine would have on the value of our homes. Several of my neighbors have also decided they will move if the mine goes through. Who would want to buy + live here?

12888 Lost Lake Road, Grass Valley, California 95945



## **INDIVIDUAL LETTER 666: RAY KINMAN**

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### **Response to Comment Ind 666-1**

Please see Response to Comment Ind 665-1.

### **Response to Comment Ind 666-2**

Please see Response to Comment Ind 665-12

### **Response to Comment Ind 666-3**

Please see Response to Comment Ind 665-3.

### **Response to Comment Ind 666-4**

Please see Response to Comment Ind 665-4.

### **Response to Comment Ind 666-5**

Please see Response to Comment Ind 665-5.

### **Response to Comment Ind 666-6**

Please see Response to Comment Ind 665-6.

### **Response to Comment Ind 666-7**

Please see Response to Comment Ind 665-7.

### **Response to Comment Ind 666-8**

Please see Response to Comment Ind 665-8.

### **Response to Comment Ind 666-9**

Please see Response to Comment Ind 665-9.

### **Response to Comment Ind 666-10**

Property value is outside the scope of CEQA – please see Master Responses 1 and 2. The comment has been forwarded to the decisionmakers for their consideration.



**From:** Becca D <beccaxdepont@yahoo.com>  
**Sent:** Monday, April 4, 2022 3:45 PM  
**To:** Idaho MMEIR  
**Subject:** Idaho MM Draft EIR Comment

**Individual Letter 667**

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April 4, 2022

Matt Kelley, Senior Planner

(Sent electronically to Idaho.MMEIR@co.nevada.ca.us)

Nevada County Planning Department

950 Maidu Avenue, Suite 170

Nevada City, CA 95959-8617

Subject: Idaho-Maryland Mine Project Draft EIR (SCH # 2020070378)

Dear Mr. Kelley,

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (Draft EIR) for the proposed Idaho-Maryland Mine Project (proposed project). The proposed project would reinstate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year permit period with gold mineralization processing and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations. The operations of the proposed would allow for unmitigable impacts on our community for 80 years resulting in significant and unavoidable environmental impacts as well as the damage the character and vitality of the community.

**Ind 667-1**

**Significant and Unavoidable Impacts**

The Draft EIR has determined that the following project impacts would remain significant and unavoidable, even after implementation of the feasible mitigation measures:

- Aesthetics

The Draft EIR determined that the proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The Draft EIR also determined that the project's incremental contribution to the significant cumulative impact related to substantial degradation of visual character or quality would be cumulatively considerable and significant and unavoidable.

- Noise.

**Ind 667-2**





The Draft EIR determined that during construction activities, the project could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity (i.e., residents along East Bennett Road during construction of the potable water line). Even with implementation of mitigation, the impact would remain significant and unavoidable.

• Transportation and Circulation

The draft EIR determined that the proposed project would result in a significant impact at three study intersections under the EPAP Plus Project scenarios, one of which would be significant and unavoidable even after mitigation (Brunswick Road/SR 174). The Draft EIR also determined that the proposed project would have a cumulatively considerable incremental contribution to two intersections under both Cumulative Plus Project scenarios, one of which would be significant and unavoidable Draft EIR Idaho-Maryland Mine Project December 2021 Chapter 6 – Alternatives Analysis Page 6-8 even after mitigation (Brunswick Road/SR 174). In addition, the project's incremental traffic would cause a significant impact at one intersection queue during both Cumulative Plus Project scenarios (Brunswick Road/Sutton Way) Mitigation measures are identified and required for the aforementioned cumulative impacts, but it cannot be guaranteed that the measures would reduce the incremental impacts to a less than cumulatively considerable level.

**Preference of the No-Build Alternative**

Preference of the Environmentally Superior Alternative, which is Alternative 1: No Project (No-Build) Alternative. The No-Build ensure that the project area and the public would not result in project related impacts in the following CEQA Appendix G sections:

• Aesthetics

○ The proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The proposed project would result in tailings, the reduction of vegetative cover, the erection of industrial use buildings, mining equipment, engineered fill, and frequent trucks to transport materials. The No-Build would not impact the visual character or quality of the site and its surroundings.

• Air Quality

○ The proposed project would result in more truck traffic to the project area resulting in more air quality emissions, which may affect the health of the community even with the implementation of mitigation measures. The No-Build would not disturb naturally occurring asbestos as could possibly occur during underground mining.

• Biological Resources

○ The No-Build would not have the potential to impact special-status plants, foothill yellow-legged frog, western pond turtle, California red-legged frog, California black rail, coast horned lizard, special-status bats, and non-special status raptors and migratory birds. In addition, the Alternative would not result in any substantial adverse effects on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on federal or State protected aquatic resources.

• Cultural Resources

○ The No-Build would not substantial adverse effect would not occur to the underground mine workings, which were determined to be historically significant pursuant to the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR). The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.

• Energy

○ The No-Build would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The No-Build would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Ind 667-3



• Geology/Soils

○ The No-Build would not include underground mining and generation of engineered fill, grading or other ground-disturbing activities, substantial soil erosion would not occur. In addition, the near-surface geotechnical features identified for closure due to dewatering of the mine would not be adversely impacted, though they may currently pose some level of risk that would continue under the Alternative. Other geotechnical issues that could pose a significant effect under the proposed project, but would not pose an adverse effect under the Alternative, include potential seismic hazards at the Brunswick Industrial Site and slope stability associated with temporary steep cut slopes at the new service shaft collar. However, the proposed project would fix a few existing geotechnical issues that would remain under this Alternative, including the safety concern related to the presence of the South Idaho Shaft on the Centennial Industrial Site, and an unstable portion of the clay-lined pond dam on the Brunswick Industrial Site.

• Greenhouse Gas Emissions

○ The No-Build would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

• Hazards & Hazardous Materials

○ The proposed project could result in a significant impact related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, specifically, the transport and underground storage and use of explosives at the Brunswick Industrial Site. Compliance with applicable federal (MSHA, OSHA), State (CCR), and local regulations, and the additional mitigation measures in the Draft EIR, would reduce the significant hazard related to transport, underground storage and use of explosives to a less-than-significant level. Because the use of explosives would be eliminated under the No-Build, the significant impact would also be eliminated. The Draft EIR determined that the proposed project could result in a significant impact related to creating a significant hazard through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment related to the Brunswick Industrial Site, given the presence of elevated arsenic in the southeastern paved area, potential residual petroleum contamination in a few locations, and presence of groundwater monitoring wells of unknown status. The No-Build would result in fewer

○ impacts related to hazards and hazardous materials.

• Hydrology/Water Quality

○ The No-Build would not result in on-site construction disturbance or above-ground operations such that the following project-related significant impacts to water quality would not occur: Centennial Industrial Site: engineered fill pad construction; Brunswick Industrial Site: operations within industrial area, underground placement of Cement Paste Backfill, use of clay-lined pond for water treatment process purposes, engineered fill pad construction, and treated water discharge in South Fork Wolf Creek. In addition, the No-Build would not necessitate dewatering of the mine, thus, there would not be a substantial reduction in groundwater supplies resulting in effects to nearby wells, though the proposed project includes mitigation to offset impacts to wells (i.e., provision of potable water service). Further, due to the lack of on-site operations, the No-Build would not result in the substantial alteration of drainage patterns, and for the Centennial Industrial Site, risk release of pollutants in a flood hazard area.

• Noise

○ The No-Build would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity, nor a substantial permanent increase in ambient noise levels in the vicinity of the project due to haul truck traffic. In addition, the Draft EIR concludes that the combined operational noise sources at the Brunswick Industrial Site could result in a significant noise impact. With respect to vibration, the Draft EIR determined that while blasting is not projected to exceed applicable thresholds, a ground vibration monitoring program should be implemented to determine the actual levels of ground vibration at commencement of mining. These operational noise and vibration impacts would not occur under the No-Build.





- Tribal Cultural Resources

- The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.

- Transportation

- The No-Build would not generate construction traffic or operational vehicle traffic on local roadways and, thus, unlike the proposed project, the Alternative would not result in a significant construction traffic impact, nor would General Plan LOS policy conflicts occur under the EPAP Plus Project conditions to the intersections of Brunswick Road/Idaho Maryland Road, Brunswick Road/SR 174, and Idaho Maryland Road/Centennial Drive; and under the Cumulative Plus Project scenarios to the intersections of Brunswick Road/SR 174 and Sutton Way/Dorsey Drive. The proposed project would also result in a significant effect to the intersection queue during the Cumulative Plus Project scenarios (Brunswick Road/Sutton Way), which would not occur under this Alternative. Further, the Draft EIR determined that proposed project (Brunswick Industrial Site operations) would have an impact related to truck turn movements at the Millsite Road/E. Bennett Road project egress at the Brunswick Industrial Site; this effect would not occur under this Alternative. The Draft EIR determined that some of the above-noted impacts would be considered significant and unavoidable due to the uncertainty concerning certain mitigation measures. The subject impacts are the EPAP Plus Project and Cumulative Plus Project intersection impacts to Brunswick Road/SR 174 and the Cumulative Plus Project intersection queue at Brunswick Road/Sutton Way. These significant and unavoidable impacts would be eliminated under this Alternative.

- Wildfire

- The No-Build would not result in a significant impact related to exacerbating wildfire hazards, as compared to the proposed project. For example, above-ground machinery would not be operated at both project sites. Therefore, potential vegetation fires associated with on-site equipment operations would be substantially reduced under the No-Build.

#### Beyond the Scope of CEQA

CEQA can be narrow in scope and does not address various issues such as social or economic issues.

The Draft EIR notes relevant caselaw on how impacts on private views are not studied under CEQA. Although this is true and accurate under CEQA, the property owners for those that would be impacted by the next 80 years of constant operation and construction would surely face a reduction in property value. Overall, the operations of the mine may act as a deterrent for the community and reduce the overall appeal of tourism as well as the demand for property within the area.

Ind 667-4

California droughts are affecting the entire state and the dewatering of our ground water supplies are going to exacerbate the issue. The area is highly prone to wildfire and the existence of the proposed project will exacerbate the wildfire risk within the project area which would affect the community at large. The permit period of 80 years is far too long, that is longer than most individuals may live and could have devastating effects on the community that would go unchecked for 80 years. The jobs the proposed project may bring into the area do not offset then potential impacts to the community and the environment. This is a quaint and appealing town, please do not decimate the positive aspects of this town for big business.

Thank you for the opportunity to review and comment on the Draft EIR. If you have any questions or would like clarification, please contact me here, [beccaxdepont@yahoo.com](mailto:beccaxdepont@yahoo.com).

Sincerely,



Rebecca De Pont



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## **INDIVIDUAL LETTER 667: REBECCA DEPONT**

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### **Response to Comment Ind 667-1**

The comment does not directly address the adequacy of the DEIR. The commenter states that the DEIR identifies impacts that are considered significant and unavoidable.

The DEIR states that, before approving a project, the lead agency shall certify that the Final EIR has been completed in compliance with CEQA, and that the Final EIR has been presented to the decision-making body of the lead agency, which has reviewed and considered the EIR. (DEIR, p. 1-9.) The lead agency shall also certify that the Final EIR reflects the lead agency's independent judgment and analysis. (*Ibid.*) The findings prepared by the lead agency must be based on substantial evidence in the administrative record and must include an explanation that bridges the gap between evidence in the record and the conclusions required by CEQA. (*Ibid.*) If the decision-making body elects to proceed with a project that would have significant unavoidable impacts, then a Statement of Overriding Considerations explaining the decision to balance the benefits of the project against unavoidable environmental impacts must also be adopted. (*Ibid.*)

### **Response to Comment Ind 667-2**

The comment restates content from the DEIR and does not address its adequacy. No further response is required.

### **Response to Comment Ind 667-3**

The commenter indicates a preference for the No Project Alternative and does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 667-4**

The comment expresses property value concerns, which are outside the scope of CEQA. Please see Master Responses 1 and 2. The commenter also expresses concerns regarding drought and wildfire. Please see Master Response 6 – Wildfire Impacts and Master Response 16 – Drought and Climate Change. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 668**

**From:** [Rebecca Vandegrift](#)  
**To:** [hobosupervisors](#)  
**Subject:** No Mine  
**Date:** Thursday, March 3, 2022 11:52:55 AM

**Dist 4**

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Dear Honored Public Officials

I wish to make my voice heard in OPPOSING the opening of the Gold Rise Mine. The disastrous effects on so many levels that this project will bring to our community far outweigh any benefits. As a 30+ years member of this community, I implore you to keep our town clean and healthy and free from outside influences that come to take our resources and leave us to clean the mess. Your constituents are looking to you to protect our water, our air, our quality of life in this place we call home.

I sincerely thank you for your time, Rebecca  
Vandegrift  
16249 Thornberry Way Grass Valley, 95949

Sent from my iPad

**Ind 668-1**



## **INDIVIDUAL LETTER 668: REBECCA VANDERGRIFT**

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### **Response to Comment Ind 668-1**

The comment does not address the adequacy of the DEIR, but expresses general concerns and opposition to the proposed project. Regarding general water concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding general air concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 669**

**From:** Reed Hamilton <reedhamilton2@gmail.com>  
**Sent:** Thursday, March 24, 2022 7:42 PM  
**To:** Idaho MMEIR  
**Subject:** DEIR Hazards

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Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902 (530) 265-1423

**Ind 669-1**

I am concerned about a deficiency in the DEIR regarding transportation of explosives to the Brunswick mine site. In chapter 4.11-24, Public Services and Utilities, the DEIR states that explosives will be transported by licensed explosives drivers under strict United States Department of Transportation rules via Brunswick Road from Highway 20/49. That route involves the very busy Sutton Way intersection, the Idaho-Maryland intersection, the Whispering Pines intersection, the Loma Rica Road intersection, and the Bennett road intersection. However, the DEIR does not state how often shipments would be arriving, what quantities would be involved, nor what times of day they would happen.

**Ind 669-2**

According to table 4.12-2 of the Transportation chapter, the following intersections have various levels of service. The Brunswick/Sutton intersection Level Of Service (LOS) varies from A to C depending on the time of day. Despite being signalized the intersection is multi-lane in all directions with right and left turn lanes involved, so complex traffic patterns lead to inevitable mishaps. The Brunswick/Idaho-Maryland Road intersection has a LOS that varies from A to F depending on direction. The Brunswick/Whispering Pines intersection has an eastbound left turn lane where drivers must contend with traffic speeding westbound up the hill. The Brunswick/Bennett Road four-way stop has LOS C at busy times of day.

Table 4.12-16 indicates that all sections from SR 49 to E. Bennett Road have peak hour LOS C or D when the survey was done, before the addition of the 50 to 100 mine trucks transporting tailings that will be using Brunswick from the mine site to Idaho-Maryland Road, or the 200 some employees of the mine. At 4.12-5 the DEIR notes that the Brunswick/Idaho-Maryland intersection saw illegal turn and through travel by vehicles, and page 16 notes that the same





intersection, plus those at Whispering Pines Lane and Bennett Street met the signal warrant, meaning that they may need a traffic light.

In regard to explosives deliveries, the trucks will be traveling through intersections that currently have LOS from C to F during peak hours. Vehicles traveling eastbound on Brunswick from the mine site will be building up speed down the steep grade from the Loma Rica Road traffic light. The speed limit there is 50 mph but heavy vehicles such as tailings trucks may struggle to limit their speeds while lighter vehicles, especially those of people leaving work at the Loma Rica Industrial Park will be speeding up. In addition, without a traffic signal at Idaho-Maryland Road, some vehicles will be turning left at the bottom of the hill without the aid of a signal.

It is easy to imagine the results of a heavy mine truck or even a passenger vehicle colliding with an explosives truck at any of the three signal-warranted intersections. As the Loma Rica Ranch housing development on the north side of Brunswick Road is built out there will be a large concentration of people and dwellings in the immediate vicinity with the possibility of large loss of life in the event of such a collision. Though the Brunswick/Sutton intersection has LOS from A to C, the complexity of the intersection and the traffic loads at busy times could lead to a disastrous accident.

It is imperative that the DEIR define the frequency, timing, and quantity of explosives being delivered and a specific regimen to assure the safety of county residents. It is also imperative that a traffic study immediately after the mine opening be specified and if there is any loss of service level or dangerous traffic patterns are detected that Rise Grass Valley be required to pay the full cost of installing signals at the warranted intersections so that residents don't have to pay for impacts they did not cause.



## **INDIVIDUAL LETTER 669: REED HAMILTON**

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### **Response to Comment Ind 669-1**

The commenter is referred to Master Response 10 - Explosives, Reagents, and Brunswick Fill.

### **Response to Comment Ind 669-2**

The commenter is referred to Master Response 10 - Explosives, Reagents, and Brunswick Fill.



**Individual Letter 670**

**From:** Renata Henry <renatahenry122@gmail.com>  
**Sent:** Monday, April 4, 2022 3:21 PM  
**To:** Idaho MMEIR  
**Subject:** Public comment on mine reopening

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Hello,

**Ind 670-1**

I am a 31-year-old Grass Valley resident and educator, and I am writing regarding the proposed Idaho-Maryland mine.

I live 8 miles from the proposed mine site, and I am extremely concerned on how the reopening of the mine would impact my community and beautiful town. In particular, the pollution to the air and water in our community that would result from the mine operations. I don't believe that the DEIR adequately addresses these issues. For example, it cites that the mine operations would not have to adhere to the 100 foot buffer building zone currently in place on Wolf Creek. When I walk my dogs in this area, I still spot acid mine drainage from when the mine was open long ago. If we lower our protections currently in place for mine operations, how is the pollution going to get any better when we still haven't been able to clean up completely from the past?

**Ind 670-2**

I also question the plan to measure air quality in the region of the mine. The DEIR doesn't seem to include the totality of air pollutants from mine operations. For example, the DEIR does not include the 4,000+ metric tons of greenhouse gases that would be emitted from cement alone per year as part of its greenhouse gas emission measurements. As someone who already struggles with health effects from fire season and poor air quality in Nevada County, I want to know that any new industrial activity that contributes particulate matter, exhaust and greenhouse gases to the air is being measured accurately and thoroughly.

These are just a few of the areas in the DEIR that seem inadequate and incomplete to me, and I urge you to demand a new DIER that is done correctly.

Thank you for your time,

Renata Henry



## **INDIVIDUAL LETTER 670: RENATA HENRY**

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### **Response to Comment Ind 670-1**

The commenter is concerned that the project would allow for development within the required 100-foot setback from the Riparian Area of a Perennial Watercourse. The commenter also states that acid mine drainage is still visible and is concerned that reopening the mine will lead to additional pollution. Mitigation Measure 4.4-3(b) requires the applicant to implement the Watercourse/Wetlands/Riparian Areas Management Plans prepared for the Centennial Industrial Site and Brunswick Area, as approved in their final form by Nevada County. Specifically, the applicant shall implement the mitigation measures and conditions identified in the Management Plans, which include measures designed to protect aquatic resources and the biological resources they support. Required measures for encroachment into non-disturbance buffers and restoration of area adjacent to impacted streams are included in the mitigation measure. (DEIR, p. 4.4-87–88.) Regarding the acid mine drainage, the commenter is referred to Master Response 8 - Mine Waste Characterization and Master Response 35 - Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 670-2**

The commenter states that the DEIR fails to include approximately 4,000 metric tons of GHGs that would be emitted from cement each year. The commenter also states that emissions generated by the project would impact the air quality of the region. Regarding the emissions generated from cement, the commenter is referred to Master Response 26 - Life Cycle GHG emissions. Regarding the impacts to air quality, the commenter is referred to Master Response 18 - Air Quality Thresholds.



**Individual Letter 671**

**From:** Theresa Huck <theresahuck@gmail.com>  
**Sent:** Monday, April 4, 2022 9:39 AM  
**To:** Idaho MMEIR  
**Subject:** Draft EIR Comment

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Dear Planning Commission,

In response to the Draft EIR, I would like to say that in the entire process there is nothing that truly addresses human health. The Yellow Giant mine (Mossman's previous bankrupted venture) has not addressed the human health catastrophe he created there. There is a human health crisis trapped in the water in that mine.

Methylated mercury, arsenic, lead, chromium and more is trapped in the old mine tunnel. Those tailings have been lying there since the mine was closed. Our health system, here in Nevada County, does not currently have the bandwidth or knowledge to deal with what will come out of the dewatering.

The point of environmental review, such as this draft EIR is to look at all the ways this will affect us. This does not accurately address protections and handling of the tailing that are in the mine already and will be moved downstream by flushing. This DEIR is short sided and does not address this in a way that it needs to be.

Thank you for your time.

Resa

Resa Huck  
(She, Her, Hers)

I understand that I am on Nisenan land that was never ceded and the original tribal families have yet to recover from the near genocide of their people.



**Ind 671-1**



## **INDIVIDUAL LETTER 671: RESA HUCK**

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### **Response to Comment Ind 671-1**

The comment does not directly address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility. Regarding the commenter’s statement that methylated mercury, arsenic, lead, chromium, and more is trapped in the old mine tunnel, the water in the mine contains only iron and manganese above state water quality guidelines (as discussed in Section 3.4.1.1 of Appendix K.2). The proposed on-site water treatment plant has been designed to adequately treat iron and manganese to state standards. The water treatment plant will be permitted by the State prior to its approval and operation. For further detail, please see Mitigation Measure 4.8-1(a). Please also see Master Response 8 – Mine Waste Characterization.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 672**

**From:** [richcharnley@gmail.com](mailto:richcharnley@gmail.com)  
**To:** [hdofsupervisors](mailto:hdofsupervisors)  
**Subject:** Idaho-Maryland mine  
**Date:** Wednesday, March 23, 2022 8:04:52 PM

Dist 3

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**Ind 672-1**

Hello, my name is Richard Charnley, owner of Empire Shoes in Grass Valley and resident of district three. I've lived in Nevada County for over thirty five years and I oppose the reopening of the Idaho-Maryland mine. There are too many negatives associated with the reopening of the mine. Some of the negative impacts are: Pollution of the air and environment, the amount of our power that will be consumed, the amount of our water that will be used, the dumping of mine waste, and most importantly the pain and suffering due to noise levels, loss of wells, loss of property values and more that the residents living within a half mile or more from the mine will have to endure. As the county supervisors it's your job to do what's best for and protect the people of Nevada County...all the people. There are too many things that can go wrong with this mine, and we all know there will be many things that will go wrong. This is a bad deal. Too many negatives. You'll be making a deal with Rise Gold, a company with a record of failure and incompetence. What do you think is going to happen if you make a deal with a company that's incompetent?...you'll be like a bank loaning money to a company that defaulted on it's last loan. Don't put the people of Nevada County in that position... And lastly, if you do approve this mine reopening, you know the residents that will be affected negatively by the mine, including myself are not going to be happy. If we have to endure loss of wells, noise from the mine and the lowering of our property values, we are not going to go down without a fight, you can expect legal repercussions. Think of the cost of that?... but let's not even go there. You were elected to do the right thing for Nevada County and to protect all the people living here, that's your job! Do your job and the right thing ....do not approve the reopening of the Idaho Maryland mine.

**Ind 672-2**

Sincerely, Richard Charnley

Sent from [Mail](#) for Wind



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[www.avast.com](http://www.avast.com)



## **INDIVIDUAL LETTER 672: RICHARD CHARNLEY**

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### **Response to Comment Ind 672-1**

The comment does not directly address the adequacy of the DEIR. For concerns regarding well impacts, please see Master Responses 14 and 15; for general concerns regarding pollution of the environment, please see Master Response 8 (Mine Waste Characterization) and 35 (Discharge to South Fork Wolf Creek); for concerns related air pollution, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; for concerns related to energy use, please see Chapter 4.3 and Impact 4.11-6 (pg. 4.11-34) of Chapter 4.11; and for concerns related to noise, please see Chapter 4.10, Noise and Vibration. Property value is outside the scope of CEQA – please see Master Responses 1 and 2.

### **Response to Comment Ind 672-2**

Please see Response to Comment Ind 672-1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 673**

**From:** RICHARD DRACE <richard.drace@gmail.com>  
**Sent:** Monday, April 4, 2022 7:31 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** RISE Gold DEIR comments

Dear Members of the *Nevada County Planning Commission*:

Clearly, the proposed mitigations for the *RISE Gold Idaho-Maryland* mine application need to be carefully critiqued.

However, please also consider the precarious lack of **organizational capacity** of *RISE Gold* to successfully implement whatever proposed mitigations might finally be submitted.

In effect, *RISE Gold* is proposing an **eighty year marriage** with Nevada County, and, as with any suitor, promises mean little if they are not carried out.

Considering how little we could have predicted eighty years ago — (in 1942!) — about our circumstances today, our County would assume **a level of risk far outweighing any potential benefits**.

If this suitor were to fail to follow through, and abandon our Nevada County family, we would suffer serious consequences for years to come.

Based on both its past performance and its current advocacy, *RISE Gold* has demonstrated a worrisome **total lack of credibility** to fulfill its promises.

Please consider this letter an ardent request to recommend denial of this project application to the *Nevada County Board of Supervisors*.

Sincerely,

Richard L. Drace  
1241230 Liquidambar Lane, Grass Valley

**Ind 673-1**



## **INDIVIDUAL LETTER 673: RICHARD DRACE**

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### **Response to Comment Ind 673-1**

Please see Master Response 3 – Operator Responsibility. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 674**

**From:** [Richard Johnston](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** Rise Mine  
**Date:** Sunday, February 20, 2022 12:57:37 PM

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Dear Mr. Kelly,

After my review of the DEIR, I fail to see what many others are concerned about. Sure, there will be some increased industrial traffic, power utilization and waste production. I believe the needed mitigations were provided by the company and that there is little to warrant stopping them from proceeding. In my mind, the threat of a community asking to stop a legitimate business for personal reasons should never be enough to stop the project from moving forward. Had there been definite health and safety issues arise in the DEIR, my tune would have changed tremendously. Being a father of four and a property owner in Nevada County, I do care about the environment and our surroundings just as much as the next person. This project doe not threaten our livelihoods like some are attempting to make it seem.

Please accept this as my vote to move the project forward and allow Rise to open the mine back up. I feel that it will open several unknown revenue streams within the county without any major negative impacts.

Thank you!  
Richard Johnston  
17762 Brewer Rd  
Grass Valley CA 95949  
5303686206

**Ind 674-1**



## **INDIVIDUAL LETTER 674: RICHARD JOHNSTON**

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### **Response to Comment Ind 674-1**

The comment does not address the adequacy of the DEIR, but rather expresses general support for the proposed project. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**From:** samba2night <samba2night@gmail.com>  
**Sent:** Monday, April 4, 2022 2:05 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** Questions regarding the Rise Gold hydrology data in the Draft EIR

**Individual Letter 675**

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Does the draft EIR address the issue that the current Northern California water models used for predicting future water conditions are seriously out of date, due much in part by the rapid effect of climate change taking place?

One of the most important tools for predicting and managing water during periods of drought are the models developed by various state and federal agencies such as the National Weather Service's Office of Hydrologic Development, the Army Corps of Engineers and the California Department of Water Resources. Yet these models suffer from a simplistic view of drought and water, and they are in dire need of an update. In the Draft EIR it is stated that the predicted drop in feet of existing wells in the areas is within a permissible number of feet.

How was this drop in feet of existing surrounding wells calculated in the Rise Gold Draft EIR and what scrutinizing has been applied to the data?

And, importantly, was the fact that existing water models currently used by the State of California acknowledged to be out of date and unreliable?

Below, according to Dr. Schwartz, the lead scientist and station manager at the University of California, Berkeley, Central Sierra Lab:

"Land surfaces, snow melt patterns and the climate have all changed since many climate models were developed, which means they're missing crucial pieces of today's water puzzle. What's prevented updates to the models for decades is shrinking funding for science and engineering.

Models may not be able to reliably inform water managers how much rain and snow will run off the land into reservoirs, which can mean severe shortages in a worst-case scenario. Given the shrinking reservoir levels and meager snowpacks of recent years, discrepancies between the water expected and that which arrives could mean the difference between having water in the taps or entire towns running dry.

Ind 675-1



↑  
We are looking down the barrel of a loaded gun with our water resources in the West. The current water monitoring and modeling strategies aren't sufficient to support the increasing number of people that need water. These are problems that we'll inevitably face as climate change continues and water becomes more unpredictable.

It's time for policymakers who allocate funding to invest in updating our water models rather than maintaining the status quo and hoping for the best. Large-scale investment in the agencies that maintain and develop these models is paramount to preparing for the future of water in the West.

Better water models ultimately mean more accurate management of water, and that will lead to greater water security and availability for the millions of people who now depend on the changing water supply. It is an investment in our future and, further, an investment in our continued ability to inhabit the water-scarce regions in the West".

Respectfully,

Rick Range

22 year resident of Nevada County.

Sent via the Samsung Galaxy Note10+, an AT&T 5G Evolution capable smartphone



## **INDIVIDUAL LETTER 675: RICK RANGE**

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### **Response to Comment Ind 675-1**

The commenter states that the DEIR's groundwater analysis is premised on models that are out of date and unreliable due to climate change. The commenter does not identify how the DEIR is inadequate with respect to impacts to groundwater. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 16 - Drought and Climate Change.





**Individual Letter 676**

**From:** samba2night <samba2night@gmail.com>  
**Sent:** Monday, April 4, 2022 2:03 PM  
**To:** Idaho MMEIR; DEIRcomments@cea-nc.org  
**Subject:** FW: Comments on Draft EIR Submission

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I am forwarding to you comments we submitted on March 28 to Idaho.MMEIR@co.nevada.ca.us

Sent from my Galaxy

----- Original message -----

From: samba2night <samba2night@gmail.com>  
Date: 3/28/22 11:56 AM (GMT-08:00)  
To: Idaho.MMEIR@co.nevada.ca.us  
Subject: Comments on Draft EIR Submission

Adhering to the April 4th deadline:

These are our concerns that need to be thoroughly investigated in the final EIR:

1. Groundwater-affects of the mine's activities on the groundwater for residents in the area with wells

**Ind 676-1**

The mine operation of dewatering huge amounts of water and other water use operations could significantly affect ground water levels leading to dry wells or less productive wells. If the affect of the dewatering cannot scientifically assure there will be no impact on the residential wells, the project should not go forward. Our existing wells are already stressed because of climate change and longer and hotter droughts, leaving aquifers that are unable to be sustained. The final EIR must take into account projected lower water tables due to drought and higher temperatures that are certain to increasingly occur because of climate change. And not to assume our current water conditions will extend in the future. There is little room for error considering the already adverse conditions that we will face without the mine. Another concern is the seismic affects of the dynamiting at the site.

**Ind 676-2**

2. How will the underground dynamiting affect the structure of the underground fissures and aquifers that deliver water to wells? How will it change given the complexities and interdependence of fissures in the course of underground water flow in surrounding areas? What provisions are there to mitigate a domino effect that may adversely ripple through them, considering possible the interlinking of these aquifers?

**Ind 676-3**

3. Air Quality

Nevada county is not in compliance with the state and local air quality standards. The county experiences bad air quality due to regular wildfires and being located at the edge of the inversion layer from the Sacramento Valley and the Bay



	<p>Area. Our residents suffer from respiratory illnesses and increased cancers from breathing unhealthy air. The additional emissions from increased traffic and on-site processing of materials will further deteriorate our already bad air quality. The final EIR must address how these emissions will be mitigated to comply with the Air Resources Board's and the Northern Sierra Air Quality Management District's air quality standards.</p>
<b>Ind 676-4</b>	<p>4. Greenhouse gases and climate change</p> <p>Any EIR must consider the effects of fossil fuels and other greenhouse gases. This is also linked to our county being designated an "extreme fire danger area". Our county could become unlivable if greenhouse gases are not mitigated. The county General Plan has zoned the property for medium density and residential business park. The General Plan is required to consider the affect of fossil fuels and other greenhouse gases in its planning. Zoning is part of that planning. The window to reduce greenhouse gases is closing behind us. Action must be taken now if we are to avoid its worst affects. The final EIR should address the rezoning as linked to the above issues.</p>
<b>Ind 676-5</b>	<p>5. Monitoring and oversight</p> <p>The final EIR should also include the monitoring, oversight, and penalties associated with the implementation of the project, both civil and criminal. How do we stop the mining company from either willfully breaking or claiming ignorance of the regulations to operate around these rules to their economic advantage?</p> <p>It appears that Rise Gold has already ignored regulations in their test drilling operations.</p>
<b>Ind 676-6</b>	<p>6. Transportation and circulation</p> <p>Hwy. 174 is a major road that forms the corridor from Hwy. 80 into Grass Valley. Additional traffic congestion from the project will impede the flow of transportation into the Brunswick basin. This is downplayed in the DEIR.</p>
<b>Ind 676-7</b>	<p>7. Aesthetics</p> <p>As a major entry way into Grass Valley, the project would change the character of our rural Grass Valley-Nevada City area as a desirable place for tourists and residents to want to visit and live here.</p> <p>Sincerely, Rick and Dianne Range 17100 Sunset Mountain Place Grass Valley</p> <p>Sent from my Galaxy</p>



## **INDIVIDUAL LETTER 676: RICK AND DIANNE RANGE**

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### **Response to Comment Ind 676-1**

The commenter is concerned that the project will have adverse impacts on groundwater wells, leading to dry or less productive wells. The DEIR analyzed the project's impact to groundwater supplies and found the impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

The commenter is concerned about the seismic effect of explosives used at the site but provides no specifics regarding this concern. The magnitude of the mine rock excavation and placement is far smaller than the magnitude of the mass of bedrock underlying the site. The magnitude of the energy released during mining excavations by rock removal and rock placement is much smaller than the magnitude of energy activation required to trigger the release of a local pre-Holocene fault. No analysis was performed nor is necessary, as there is no potential for inducement of seismic activity on these faults from the proposed mining activity. The commenter is referred to the NV5 Memo attached to the Final EIR as Appendix P. Blasting vibrations are analyzed in Chapter 4.10 of the DEIR.

### **Response to Comment Ind 676-2**

The commenter is concerned that the underground blasting will impact the hydrological connection to private groundwater wells. As discussed on pages 15-19 of Appendix M, numerous holes must be drilled and blasted sequentially into a void (the free face) in order to fracture rock and create mining excavations. Any blast damage to surround rocks, such as cracks, would be limited to a few feet surrounding the excavation. Therefore, blasting cannot "damage the aquifer" or cause draining of surface water and groundwater.

### **Response to Comment Ind 676-3**

The commenter states that Nevada County's air quality is already poor and that the project will exacerbate those conditions. The commenter states that the DEIR must demonstrate the project will comply with air quality standards. The DEIR demonstrates that the project will comply with applicable air quality standards with implementation of mitigation measures. (DEIR, 4.3-66.) The commenter is also referred to Master Response 18 - Air Quality Thresholds.

### **Response to Comment Ind 676-4**

The commenter states that the DEIR must analyze GHG emissions. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

### **Response to Comment Ind 676-5**

The commenter states that the Final EIR should include a monitoring program for the project and the commenter also references the Project Applicant's prior mining project. A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The project mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 - Operator Responsibility.

### **Response to Comment Ind 676-6**

The commenter states that the DEIR understates the project's traffic-related impact to SR 174. However, the DEIR acknowledges that the project's impact to the intersection at SR 174 and



Brunswick Road would be significant and unavoidable. While the DEIR concludes that the proposed project would have a significant and unavoidable impact to the SR 174/Brunswick Road intersection, Mitigation Measure 4.12-1(b) of the DEIR requires the applicant to enter into a Traffic Mitigation Agreement with the County regarding the SR 174/Brunswick Road intersection. The Agreement shall require the applicant to pay the project's fair share contribution toward the improvements necessary to improve intersection operations to an acceptable level. The Agreement shall include the fair share calculations and total payment amount. Based on the Caltrans methodology to assess fair share, it is estimated that the fair share percentage is 14.9%. While the project is contributing toward addressing its contribution of traffic to the SR 174/Brunswick Road intersection, the remaining funding needed to improve the intersection (e.g., signalization) is not yet certain, nor secured. As a result, the DEIR conservatively concludes that the impact would remain significant and unavoidable.

**Response to Comment Ind 676-7**

The commenter states that the project would change the visual character of the surrounding area. The DEIR has determined that the project would have a significant and unavoidable aesthetics impact even after implementation of mitigation. (DEIR, p. 4.1-14-15.)





**Individual Letter 677**

**From:** samba2night <samba2night@gmail.com>  
**Sent:** Monday, March 28, 2022 11:57 AM  
**To:** Idaho MMEIR  
**Subject:** Comments on Draft EIR Submission

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Adhering to the April 4th deadline:

These are our concerns that need to be thoroughly investigated in the final EIR:

1. Groundwater-affects of the mine's activities on the groundwater for residents in the area with wells

The mine operation of dewatering huge amounts of water and other water use operations could significantly affect ground water levels leading to dry wells or less productive wells. If the affect of the dewatering cannot scientifically assure there will be no impact on the residential wells, the project should not go forward. Our existing wells are already stressed because of climate change and longer and hotter droughts, leaving aquifers that are unable to be sustained. The final EIR must take into account projected lower water tables due to drought and higher temperatures that are certain to increasingly occur because of climate change. And not to assume our current water conditions will extend in the future. There is little room for error considering the already adverse conditions that we will face without the mine. Another concern is the seismic affects of the dynamiting at the site.

2. How will the underground dynamiting affect the structure of the underground fissures and aquifers that deliver water to wells? How will it change given the complexities and interdependence of fissures in the course of underground water flow in surrounding areas? What provisions are there to mitigate a domino effect that may adversely ripple through them, considering possible the interlinking of these aquifers?

3. Air Quality

Nevada county is not in compliance with the state and local air quality standards. The county experiences bad air quality due to regular wildfires and being located at the edge of the inversion layer from the Sacramento Valley and the Bay Area. Our residents suffer from respiratory illnesses and increased cancers from breathing unhealthy air. The additional emissions from increased traffic and on-site processing of materials will further deteriorate our already bad air quality. The final EIR must address how these emissions will be mitigated to comply with the Air Resources Board's and the Northern Sierra Air Quality Management District's air quality standards.

4. Greenhouse gases and climate change

Any EIR must consider the effects of fossil fuels and other greenhouse gases. This is also linked to our county being designated an "extreme fire danger area". Our county could become unlivable if greenhouse gases are not mitigated. The county General Plan has zoned the property for medium density and residential business park. The General Plan is required to consider the affect of fossil fuels and other greenhouse gases in its planning. Zoning is part of that planning. The window to reduce greenhouse gases is closing behind us. Action must be taken now if we are to avoid its worst affects. The final EIR should address the rezoning as linked to the above issues.

Ind 677-1





5. Monitoring and oversight

The final EIR should also include the monitoring, oversight, and penalties associated with the implementation of the project, both civil and criminal. How do we stop the mining company from either willfully breaking or claiming ignorance of the regulations to operate around these rules to their economic advantage?

It appears that Rise Gold has already ignored regulations in their test drilling operations.

6. Transportation and circulation

Hwy. 174 is a major road that forms the corridor from Hwy. 80 into Grass Valley. Additional traffic congestion from the project will impede the flow of transportation into the Brunswick basin. This is downplayed in the DEIR.

7. Aesthetics

As a major entry way into Grass Valley, the project would change the character of our rural Grass Valley-Nevada City area as a desirable place for tourists and residents to want to visit and live here.

Sincerely,  
Rick and Dianne Range  
17100 Sunset Mountain Place  
Grass Valley

Scanned from my Galaxy



## **INDIVIDUAL LETTER 677: RICK AND DIANNE RANGE**

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### **Response to Comment Ind 677-1**

This letter is a duplicate copy of Individual Letter 676. Please see comments and responses in Individual Letter 676.



**Individual Letter 678**

**From:** kathleen smith <hockeyisluv@gmail.com>  
**Sent:** Friday, March 18, 2022 1:42 PM  
**To:** Idaho MMEIR  
**Subject:** Please don't open the mines

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**Ind 678-1**

We are 43 year residence of Grass Valley. We are opposed to this. We hope this doesn't go through. Rick and Kathleen Smith



## **INDIVIDUAL LETTER 678: RICK AND KATHLEEN SMITH**

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### **Response to Comment Ind 678-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 679

To: Matt Kelley, Senior Planner, Members of the Planning Commission and Board of Supervisors.

Re: Idaho Maryland Mine – Rise Gold, Grass Valley

Fr: Ricki Heck, Homeowner, 13641 Greenhorn Road, Within the mineral rights zone

March 23, 2022

Dear Mr. Kelly -

I have lived on my property since the early 1980's, built my home, raised my children and now am enjoying retirement; all on the same property. I have lovingly tended to the gardens, landscape and hardscape over 40 years. This is my home and my treasure. I am writing to share my concerns about the adequacy of the EIR and highlight those areas where I believe the Draft EIR is simply inadequate.

Ind 679-1

Water Quality Impacts to Neighborhoods.

✦ My well and that of three of my immediate neighbors does not appear on the Applicants map of wells. The state database, Well Completion Report does not show my well, or that of 3 of my immediate neighbors. My well was drilled in 1981 by a private person who either did not know to report it or simply did not report. How many other wells may be unaccounted for? This omission is a serious inadequacy of the DEIR.

Ind 679-2

▪ Please require the Applicant to conduct a door to door, parcel by parcel inquiry to obtain an accurate count of the number of wells within the mineral rights area and within 1,000 feet of the mineral rights area. I believe a door-to-door survey may have been a condition of approval for the EmGold project, 20 years ago. This may be the only way to obtain an accurate count of the number of wells in the project area.

Ind 679-3

▪ Once an accurate count of wells is produced, I believe the Applicant should then conduct both potability and mineral/metal content testing, at the applicant's expense, of each well to establish a baseline. I believe the scope of potential water contamination may be far greater than is currently considered and can only be measured by an established baseline examination.

Ind 679-4

▪ Should wells beyond the scope of the project become compromised or contaminated, Rise would need to be required to extend NID system lines well beyond their current E. Bennet area to serve all households with compromised wells. I know the costs of connecting to NID is substantial, and would need to include actual hookups to each home paid for by Rise, and 80 years' worth of water payments to NID, including any costs in the raise in rates that are likely to occur over the term of the operations. Both the financial impacts and the environmental impacts should be evaluated in the event the number of wells exceeds the 30 as identified by the applicant.

Ind 679-5

▪ At what levels of contamination or change in water quality would be mandated for Rise to take action for private well owners, how will that be defined? Please include a definition of how "contamination" is measured

Ind 679-6

▪ I also note an omission in the DEIR that does not reveal levels of arsenic or mercury from their water sampling. Either this was an omitted test or left out of the discussion. Please require this information to be included in the document.

Ind 679-7

▪ Our well has produced sparkling clear, pure water since it was drilled, about 1981. That well is my only source of water. It has performed beautifully and reliably for my family and gardens for over 40 years.

Noise.

▪ One of the things I love most about living on my land is the quiet. I am extremely worried and concerned that the noise generated from the mining operations, said to be 24 hrs day / 7 days a week, would simply ruin the rural quality of my home and life and that of the other residents who live within the sphere of the project

Ind 679-8

▪ Please, please, should the project go forward, put reasonable restrictions on operating hours. In the EmGold process, I believe it was 7:00 am to 6:00 pm. No noise or trucks would be allowed outside of those hours.

Ind 679-9

▪ If the project is allowed to go forward without restrictions on operating hours, I simply could not live with the noise and traffic impacts. I would need to leave the neighborhood, my beloved home and gardens.





	<b><u>Traffic and Fire Evacuation. The DEIR does not adequately address traffic and Fire Evacuation Routes.</u></b>
Ind 679-10	<ul style="list-style-type: none"> <li>▪ The DEIR did not mention fire evacuation routes in the Traffic Impact Analysis Appendix, this is a serious oversight.</li> </ul>
Ind 679-11	<ul style="list-style-type: none"> <li>▪ The Greenhorn, E. Bennett, and Brunswick areas are known severe high fire areas and its residents have very few options for fire evacuation. Yet the DEIR says on page 594, "The Greenhorn Road area would likely have several evacuation zones because it is a relatively large area". This statement is ridiculous. I would suggest the Applicant work with the Fire Wise Communities of each area of potential impact to more accurately assess risks.</li> </ul>
Ind 679-12	<ul style="list-style-type: none"> <li>▪ The information in the DEIR with regard to evacuation routes was simply a cut and paste exercise of existing general plan, OES, and Cal Fire evacuation protocols. I did not see any efforts to discuss how the hundreds of employees and the vehicles and trucks would impact the community in the event of an evacuation.</li> </ul>
Ind 679-13	<ul style="list-style-type: none"> <li>▪ The assertion in section 4.7.4 and 4.13.1 of Table 2.1 states the impacts to the emergency response and emergency evacuation as being less than significant seems wrong. Upon what information is this conclusion based upon? It cannot be the Traffic Impact Analysis because that document does not address fire evacuations.</li> </ul>
Ind 679-14	<ul style="list-style-type: none"> <li>▪ Please require an in-depth analysis of specific impacts of the increased load due to the mining operations.</li> </ul>
	<b><u>Inverse Condemnation. The DEIR should address <i>local</i> conditions within the real estate market.</u></b>
Ind 679-15	<ul style="list-style-type: none"> <li>▪ As a 30-year real estate professional, I strongly believe that if allowed to move forward, the homeowners within the sphere of the project may have their homes devalued and be unable to sell for fair market value, or more likely, be unable to sell at all. I believe the noise, water and traffic conditions alone would be a "taking", a cause for an inverse condemnation action.</li> </ul>
Ind 679-16	<ul style="list-style-type: none"> <li>▪ While I do understand that CEQA does not require an economic analysis, our local area would be severely impacted from a collapse of real estate values of the several hundred homes surrounding the project. I ask that a <i>local</i> analysis be made using <i>local</i> real estate professionals on the impacts to home values in the sphere of the project. The DEIR should address local conditions within the real estate market, and offer mitigations in the event such a "taking" occurs.</li> </ul>
Ind 679-17	<ul style="list-style-type: none"> <li>▪ This information will be valuable in assessing the applicant's claim of economic benefits against the loss of home value and the corresponding equity that is present in our community.</li> </ul>
	<b><u>Collapsing Tunnels. – The DEIR must address the issue of collapsing tunnels.</u></b>
Ind 679-18	<ul style="list-style-type: none"> <li>▪ As a long-time real estate professional, I have personally witnessed a brand-new home, nearby the project in the Brunswick Pines area that fell into a previously unknown mine tunnel. It happened about 15-20 years ago.</li> </ul>
Ind 679-19	<ul style="list-style-type: none"> <li>▪ I would like to see a specific study on the probability of homes and lands being swallowed once the dewatering takes place. This is a <i>real</i> concern, and something that happens more often than is thought. Tunnel collapses can happen anywhere.</li> </ul>
Ind 679-20	<ul style="list-style-type: none"> <li>▪ I did not see a reference in the DEIR regarding collapsing tunnels or sink holes, or an offer of mitigation in the event of a collapse. This must be considered.</li> </ul>
Ind 679-21	<p>My concerns are many, with only a few stated here. While mining may have given Nevada County its beginnings; our lifestyle, economy and quality of life have changed since those days. There are homes and families that have invested in our community by building residential communities around this mine area. <b><i>I urge you and the Board of Supervisors to demand the best for our community. Please require the Applicant to reevaluate the many inadequacies of the DEIR, do further research, re submit and recirculate the DRAFT. Please ask yourselves; "If my home was in this area, how would I feel, what assurances would I want and what protections do I deserve."</i></b></p> <p>Respectfully, <i>R iki H ek</i> 13641 Greenhorn Road</p>



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## **INDIVIDUAL LETTER 679: RICKI HECK**

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### **Response to Comment Ind 679-1**

As discussed in Section 3.3.2 and shown on Sheet 12 of Appendix K.2 of the DEIR, over 1,200 Water Well Driller Reports (also known as Well Completion Reports) available from the California Department of Water Resources (DWR)'s online database for private domestic wells are located within approximately one to two miles of the project site. Many of these wells are geolocated by property location in the DWR database while some are only located by the US Public Land Survey System (PLSS) township, range, and section. In areas within the predicted 1-foot drawdown from the groundwater model, wells with only general PLSS locations in the DWR database were matched to properties and plotted. The well database was also augmented with well data from the previous applicant Emgold, which provides additional well information within the 1-foot drawdown isopleth that is not available in the DWR database. All available details about well construction and testing in the area of the 1-foot drawdown isopleth were reviewed and tabulated from the Well Completion Report or Emgold records and are provided and discussed in Section 3.3.2 of Appendix K.2. which are available for the majority of properties. The Well Mitigation Plan has been clarified to include measures to identify any wells not in the well database and gather individual well characteristics should an impact be predicted by the Groundwater Monitoring Plan. The revised Well Mitigation Plan is attached to the Final EIR as Appendix D. The commenter states that a complete inventory of domestic water wells within and beyond the mineral rights boundary is required for the analysis of the DEIR. However, wells outside the 1-ft drawdown were not specifically analyzed for impacts from mine dewatering because they would experience negligible drawdown and therefore would not be significantly impacted by mine dewatering. More effort in including these wells in the well database would not change the analysis nor conclusions of the DEIR, nor the necessary mitigation measures, and therefore is not required.

With respect to the commenter's property specifically, this property is located outside of the 1-ft isopleth as shown on Sheet 12 of Appendix K.2 of the DEIR and therefore is predicted to experience negligible drawdown (less than one foot) and impact from mine dewatering. Approximately five wells adjacent to the commenter's property are mapped on Sheet 12 based on the DWR database information. Nevertheless, the groundwater monitoring plan is implemented to ensure that any impact would be predicted and preemptively mitigated, if necessary. Please see Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 7 - Location of Future Mining Areas.

### **Response to Comment Ind 679-2**

Please see Response to Comment Ind 679-1.

### **Response to Comment Ind 679-3**

Baseline groundwater quality data is required to be collected 12 months before the commencement of mine dewatering and will be collected from groundwater monitoring wells which will be representative the groundwater quality in surrounding domestic water wells. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.



#### **Response to Comment Ind 679-4**

The Well Mitigation Plan has been clarified to explain actions that would be taken for well mitigation, if required, in more detail. Please see the revised Well Mitigation Plan attached the Final EIR as Appendix D. Well mitigation outside of the E. Bennett area may not include the connection to NID potable water depending on the circumstances, as storage tanks and/or well deepening may be adequate solutions. Any mitigation required for wells impacted by the project would be done so at the cost of the applicant. Please also see Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 7 - Location of Future Mining Areas.

#### **Response to Comment Ind 679-5**

Mitigation Measures are designed to ensure wells would not be contaminated by mining activities and baseline groundwater quality data will be collected and groundwater quality will be monitored throughout operations. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells.

#### **Response to Comment Ind 679-6**

Arsenic and mercury were analyzed in water samples. Please see Tables 3-6, 3-7, and 3-9 of Appendix K.2.

#### **Response to Comment Ind 679-7**

Comment noted regarding the commenter's existing groundwater well. Noise from project activities has been analyzed in Chapter 4.10 of the DEIR and was determined to be less than significant after mitigation. Please see Chapter 4.10 of the DEIR. Furthermore, while the DEIR determined, based on best available data, that the project's operations would not result in noise levels that would exceed the County's thresholds, the DEIR conservatively concludes that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and the project's noise impacts could be significant. As a result, the DEIR includes Mitigation Measure 4.10-3, which requires implementation of a robust, ongoing noise monitoring program. The noise monitoring program shall evaluate noise levels at a minimum of five receptor locations surrounding the Brunswick Industrial Site. The noise monitoring system shall consist of the installation of permanent noise monitors at three to five locations on the Brunswick Industrial Site, and one site at the Centennial Industrial Site, to be determined by a third-party noise consultant under contract with the County, in coordination with the applicant. The permanent monitors shall be provided with a continual power source, and shall include internet connectivity technology, to enable electronic retrieval of noise monitoring data at any time by the County's third-party noise consultant. The County's third-party noise consultant is required to retrieve and evaluate mine-related operational noise levels within 30 days of commencement of mining, quarterly thereafter for the first five years, and then once per year thereafter for the life of the project. If noise levels are found to exceed the County's standards, then operation of the mine shall cease, until additional engineering controls can be implemented as needed.

Also see Master Response 1 - Non-EIR/Administrative Issues.

#### **Response to Comment Ind 679-8**

Noise from project activities, including nighttime activities, has been analyzed in Chapter 4.10 of the DEIR and is less than significant after mitigation. The applicable CEQA threshold of significance for noise impacts is not "no noise". Please see Chapter 4.10 and Appendix L of the DEIR. Also see Master Response 1 - Non-EIR/Administrative Issues.



**Response to Comment Ind 679-9**

Please see Master Response 1 - Non-EIR/Administrative Issues.

**Response to Comment Ind 679-10**

Fire evacuation routes are discussed and analyzed in Chapter 4.13 of the DEIR. Please also see Master Response 5 - Evacuation Zones.

**Response to Comment Ind 679-11**

The Greenhorn Road area is currently broken into two evacuation zones. Please see Master Response 5 - Evacuation Zones.

**Response to Comment Ind 679-12**

Please see Master Response 5 - Evacuation Zones.

**Response to Comment Ind 679-13**

Fire evacuation routes are discussed and analyzed in Chapter 4.13 of the DEIR. The analysis is based on review of available data and correspondence with agency staff, including County OES and applicable fire agencies. Please refer to the footnotes in Chapter 4.13. Please also see Master Response 5 - Evacuation Zones.

**Response to Comment Ind 679-14**

Please see Master Response 5 - Evacuation Zones.

**Response to Comment Ind 679-15**

The comment does not address the adequacy of the DEIR but has been forwarded to the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

**Response to Comment Ind 679-16**

The comment does not address the adequacy of the DEIR but has been forwarded to the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

**Response to Comment Ind 679-17**

The comment does not address the adequacy of the DEIR but has been forwarded to the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

**Response to Comment Ind 679-18**

As discussed on page 6 of Appendix H.6, the Old Brunswick mine features were described during the parcel map creation in a geotechnical report by Anderson (1986), who conducted test boring and delineated areas inappropriate for residential construction over the Old Brunswick mine features which were incorporated into the final map for Bet Acres.

As discussed on page 6 of Appendix H.6, the Old Brunswick Incline Shaft is located at 12305 Bet Road. The feature extends from the ground surface at an incline of approximately 45 to 50 degrees to the 1,250-level of the mine. A Non-engineered soil/rock backfill collapsed in 1998 at the existing residence location. The collapse was likely associated with a vertical excavation to the ground surface from the incline shaft. The collapsed portal was closed by engineered design and the foundation of the house was underpinned (Carlton Engineering, Structural Engineer Thomas Burkhart, S.E. 4378) in 2000 and 2001. Design and permitting documents are on file with Nevada County Building Department (Permit # 72094).



Near surface workings and subsidence are analyzed on pages 4.6-44 through 4.6-47 and Appendix H.6 of the DEIR. Please also see Master Response 29 - Near Surface Workings.

**Response to Comment Ind 679-19**

The commenter states that a tunnel collapse can happen anywhere. However, a tunnel must actually be present and such a tunnel must be close to surface to cause subsidence. Please see Response to Comment Ind 679-18, DEIR pages 4.6-44 through 4.6-47, and Appendix H.6 of the DEIR. See also Master Response 29 - Near Surface Workings.

**Response to Comment Ind 679-20**

Near surface workings and subsidence are analyzed on pages 4.6-44 through 4.6-47 of the DEIR and Appendix H.6 of the DEIR. Please also see Master Response 29 - Near Surface Workings.

**Response to Comment Ind 679-21**

The commenter's opposition to the project is noted for decisionmakers. The County has determined that recirculation of the DEIR is not required as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met. Please also see Master Response 1 - Non-EIR/Administrative Issues.





**Individual Letter 680**

**From:** Risa & Rob Roseman <rrzenrose@gmail.com>  
**Sent:** Thursday, March 24, 2022 1:38 PM  
**To:** Idaho MMEIR  
**Subject:** Public Comment Letter

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Risa Roseman  
245 N Auburn St.  
Grass Valley, Ca 95945  
530-613-4408  
[rrzenrose@gmail.com](mailto:rrzenrose@gmail.com)

March 23, 2022

Matt Kelley  
Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902  
530-265-1423  
[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)

Dear Mr Kelley,

My family and I live in downtown Grass Valley. We purchased our home in 2004 and since then have taken care of our 1870's Victorian and yard. We love our neighborhood and the proximity to downtown, library, stores and the Center for the Arts. It is a vibrant community of locals and tourists that keep these downtown business's going. I am very concerned about how the proposed Idaho-Maryland Mine Project by Rise Gold could impact our community. I've been reading the DIER and have some concerns about noise, traffic mineral processing and heavy equipment will impact on our community.

**Ind 680-1**

Noise and Vibration 4.10

Testing for Noise: Why are the noise testing areas limited to an area so close to the mine sites? The geography of Grass Valley is a VALLEY, noise travels far and wide. There should be noise test sites all over the county not just in close proximity to the mine sites. For example; Grass Valley at Mill St & Main St., Nevada Union High School, Union Hill School, Sierra Nevada Memorial Hospital and Sierra College.

**Ind 680-2**

Truck Traffic, Mineral Processing, Vibrations Levels of Heavy Earth Moving Equipment: Again I ask, why are the monitors and testing limited to areas only near the 2 mine sites? I request expansion of the monitoring to at least these suggested



↑ sites: Grass Valley at Mill St & Main St., Nevada Union High School, Union Hill School, Sierra Nevada Memorial Hospital and Sierra College.

**Ind 680-3**

I oppose allowing Rise Gold to re-open The Idaho-Maryland Mine. It will not benefit our community in the short or long run. How can we in good conscience allow a business in our county that uses more water than we currently use, while the state of California and Nevada County is in such a severe drought and we are being asked to ration our water? How can we allow a company to open a business that will increase energy use in this county by 25% when we are having increased power outages due to fires, over use during peak hours and weather? The DEIR does not discuss mitigating plans for bringing more water or power to Nevada County. I think the DIER should address this, such as building a renewable energy power plant to generate the additional power they need plus help meet the county's energy needs.

**Ind 680-4**

Sincerely,

Risa Roseman



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## **INDIVIDUAL LETTER 680: RISA ROSEMAN**

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### **Response to Comment Ind 680-1**

As discussed on page 4.10-4 of the DEIR, Bollard Acoustical Consultants conducted continuous noise level measurements at 11 locations in the project vicinity (see Figure 4.10-3 of the DEIR). The noise measurement locations were selected to be representative of ambient noise conditions at receptors nearest to both the Brunswick and Centennial Industrial Sites, at locations along East Bennett Road where the potable water system would be installed, and at receptors along the proposed haul routes. Any receptors further from these locations would be subject to lower noise levels, and thus, analysis of receptors located further away is not necessary.

The DEIR evaluates potential impacts associated with substantial increases in ambient noise levels relative to existing conditions under Impacts 4.10-1, 4.10-2, and 4.10-3. Where potential impacts are identified, the DEIR sets forth mitigation measures to reduce the severity level of the identified impacts to the extent feasible and discloses the level of impact that would occur subsequent to incorporation of mitigation. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.

### **Response to Comment Ind 680-2**

Please see Response to Comment Ind 680-1.

### **Response to Comment Ind 680-3**

The comment does not directly address the adequacy of the DEIR. Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

### **Response to Comment Ind 680-4**

The DEIR evaluates potential impacts associated with water supply in Chapter 4.8, Hydrology and Water Quality, and Chapter 4.11, Public Services and Utilities. The DEIR evaluates potential impacts associated with energy use in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. Please see the discussions and analyses contained therein. In addition, please see Master Responses 15 and 16.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 681**

Nevada County Board of Supervisors/ Nevada County Planning Commission

950 Maidu Avenue  
Nevada City, CA 95959-8617

Dear Supervisors and Planning Commission,

March 13, 2022

**Ind 681-1**

I'm writing to you today because in reading the EIR, there is SO MUCH that has not been considered. How can they say there is 'minimal mitigation' needed when TON's of explosives are being trucked through our town every one to three weeks? Oh sure- the driver has to be a 'certified' explosive hauler....that makes me feel so much better. If that truck is rear ended on the offramp it takes, it could blow up Grass Valley Charter School at Hwy 174 offramp, or Rite Aid drugstore at the Brunswick offramp, or maybe if we are lucky- it will be the Idaho Maryland offramp and only kill a few people in their cars and damage Hills Flat Lumber.

**Ind 681-2**

I've been a resident of Grass Valley- living right in the downtown area- for about 16 years now. I am also a business owner and have a shop on Loma Rica Dr. close to the airport which will be effected by the noise and pollution from the mine. I moved here because of the beauty & quiet, peaceful nature of living in a small town. I realize that there has been a history of mining in this area for some 170 years, however I was under the impression that those days were done and most of the jobs and income was from tourism, or high tech business's to our beautiful area. We should be very careful not to pollute our air and water, so people will still come up to our town to enjoy the vibrant town we have created. The EIR has not really addressed many concerns-

**Ind 681-3**

1) How will the downtown area be affected by noise from the 100 truck trips per day.  
a) Noise travels across the valley that Wolf Creek carves out along Idaho Maryland road. Trucks dumping material 100 times a day up by Centennial Dr. will be heard by many residents and then there is the grading and compacting operation, which they say will be running 7 days a week from 6AM-10PM. Really!!!! Even construction sites aren't suppose to operate on Saturdays and Sundays.....and then starting at 6 AM on a weekend.....there goes sleeping in.....This is unheard of and should not be allowed! I don't see where the EIR addresses this.

**Ind 681-4**

2) How will all those machines/trucks affect our air quality.  
a) We already suffer from bad ozone pollution coming up from the Sac. Valley Do we really want all that extra particulate matter put into our air too? Is the extra 100 trips a day really something we need to "mitigate" with carbon credits? The air is not going to be cleaned by those 'carbon credits'





- ↑
- 3) How will they insure that the explosives they use will be safely transported through our town? As the EIR states; Explosives would be transported to the Brunswick Industrial Site a maximum of once a week to a minimum of once every three weeks.
- They may be getting off Highway 49 at the main downtown exit and there-by passing right by Grass Valley Charter School (formerly Hennessy) at the bottom of the exit-or perhaps they will get off at Idaho Maryland Rd. In which case they will wind up a very narrow stretch of road on Idaho Maryland between Sutton and Brunswick. (A road I frequently bike up-Large trucks going up this road are very scary as there is NO shoulder.)
- 4) How will they insure that the vibrations from the explosives they use won't effect the sensitive business's in Whispering Pines business area. Again- the EIR is just speculative:
- The U.S. Bureau of Mines (USBM) and Office of Surface Mining, Reclamation, and Enforcement (OSMRE) have both developed recommendations for ground vibration levels to prevent damage to residential structures. Dr. Konya of Precision Blasting Services recommended a threshold level of 0.4 in/s PPV for the IMM project. The threshold level is based on previous studies for which it was determined that less than approximately eight percent of people would complain about blasting activities if the peak particle velocity was below 0.4 in/s. The project-specific blasting report recommends this threshold be applied at the location of receptors on surface to minimize annoyance and complaints.
- Should we be content that only 8% of the population is upset/complaining about the vibrations from the blasting- what happens if it is 12% or 20%. What is the threshold of upset people considered acceptable?**
- a) How can we be assured that we won't be woken up in the middle of the night by little "earthquakes" from their underground explosions? Oh sure they have their noise receptors along the haul routes, but not right across the valley in Downtown. We will never know what woke us up in the middle of the night-and those sensors won't do us any good at figuring it out either.....
- b) Will they compensate landowners if there is damage to property from the shaking?
- c) What about sink-holes caused by underground mining activity?
- a) The city of Grass Valley already had to deal with a major sinkhole on Freeman lane by Wolf Creek, cause by a drainage pipe that was damaged and not releasing water into the creek.
- b) What sort of bond might they be required to put up to insure that they are solvent enough to pay for any damages that might incur.
- 5) And for the people living very near to the site- Their property values are going to suffer mighty bad from having a mine move in and potentially de-water their wells. I know that Rise Gold has proposed hooking them up to NID, but they have already invested in drilling and maintaining their own wells, and now to be told they might not have water anymore and must pay the Utility for it.....that is not part of the deal these
- ↓

Ind 681-5

Ind 681-6

Ind 681-7

Ind 681-8





Ind 681-9

people should be going through now. Especially because people have already suffered through this pandemic.

6) Do the young people of Nevada County really want the job of an underground miner? Has anyone taken a survey and asked them? I would bet that the new high school graduates of Nevada Union High School will not be lining up to apply for these jobs- and they certainly won't be making \$94,000/year as Rise Gold says the 'average salary' is..... They will be making \$20-\$25/hour, risking their lives, to enrich a Canadian Companies stockholders. No thanks- Not my kids.

Ind 681-10

Please say NO to this enormous gamble that the county will be taking if it approves this mine.

I appreciate your thoughtful consideration.

Sincerely,  
Rob Katzenstein  
245 N. Auburn St.  
Grass Valley, Ca. 95945      530 218-7124    robkatsolar@gmail.com



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## **INDIVIDUAL LETTER 681: ROB KATZENSTEIN**

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### **Response to Comment Ind 681-1**

The commenter is concerned about the transport of explosives required by the project. As stated on page 4.7-25 of the DEIR, the transportation of explosives in the U.S. has an excellent safety record. A review of DOT incident reports for highway transportation of class 1.1B, 1.4B, 1.1D, and 1.5D materials shows 149 incidents over the past 30 years in the U.S. The majority of these incidents were vehicle accidents resulting in no release or spillages. No fatalities were reported in any incidents and only one incident resulted in injuries. The commenter's remarks regarding an accident that cause an explosion is speculative. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

### **Response to Comment Ind 681-2**

The commenter provides an introduction and states we should be careful not to pollute air and water but does not identify how the DEIR is inadequate. Impacts to water are analyzed in Chapter 4.8 (Hydrology and Water Quality) of the DEIR. Impacts to air quality are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR.

### **Response to Comment Ind 681-3**

The commenter is concerned about the noise from trucks in downtown Grass Valley. The project does not propose any truck routes in downtown Grass Valley. (DEIR, Figure 3-13.) DEIR Chapter 4.10 (Noise and Vibration) analyzed noise impacts from trucks and found the impacts to be less than significant after mitigation. (DEIR, p. 4.10-31.)

### **Response to Comment Ind 681-4**

The commenter is concerned with the project's impacts to air quality and questions the efficacy of carbon offsets. The commenter also questions how the project will ensure safe transportation of explosives to the project site. The commenter does not identify any inadequacies with the DEIR. Air emissions from trucks and other machinery are analyzed in the DEIR, and all impacts related to air quality were determined to be less-than-significant after mitigation. The commenter is referred to Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and Appendix E.1 of the DEIR. The commenter is also referred to Master Response 18 - Air Quality Thresholds. Carbon offsets required under Mitigation Measure 4.3-7(b) would ensure that construction-related emissions would be reduced sufficiently to ensure that the project's incremental contribution of GHG emissions would be less than cumulatively considerable. A detailed discussion of explosives transportation and regulations is provided in Chapter 4.7 (Hazards and Hazardous Materials) of the DEIR.

### **Response to Comment Ind 681-5**

The commenter is concerned about the noise and vibration impacts from the use of explosives and states that the DEIR is speculative but does not provide any additional information. As stated on page 25 of Appendix M of the DEIR, the mining activities are located far from downtown Grass Valley and no ground vibration is expected. It is highly unlikely for anyone in downtown Grass Valley to perceive the ground vibration or for the ground vibration to cause any damage.

Blasting activities are intermittent. As discussed in Chapter 4.10 of the DEIR and the Technical Blasting Report prepared by Precision Blasting Services (Appendix M to the DEIR), a maximum of 0.23 inches per second vibration is modeled where a longhole blast could occur directly



beneath a receptor at 500 feet depth. Notwithstanding the rarity of this situation, such a blast might occur every three or four days between shift changes (7:00 AM and 7:00 PM) and would last for only seconds. At 500 feet depth and a horizontal offset of 1,400 feet, such a longhole blast would be undetectable by blasting seismograph (PPV <0.05 in/sec). Regular drift round blasting, occurring approximately twice daily over several seconds, are modeled to result in a maximum of 0.14 inches per second vibration at a depth of 500 feet directly beneath a receptor. At 500 feet depth and a horizontal offset of 900 feet, a drift round blast would be undetectable by blasting seismograph (PPV <0.05 in/sec). Historic mining was completed to approximately 1,600 feet depth and the majority of future mining would be below the historic mine. At this distance, regular drift round blasting and longhole blast would be undetectable by blasting seismograph (PPV <0.05 in/sec) at receptor locations directly above the blast location.

#### **Response to Comment Ind 681-6**

The commenter asks if property owners will be compensated if there is damage from vibrations. As stated on page 4.10-54 of the DEIR, all groundborne vibrations calculated for blasting of both drift round and long-hole stopes, respectively, fall below the U.S. Bureau of Mines recommendations and the levels at which structural damage to buildings is possible. Regarding economic damages, the commenter is referred to Master Response 2 – Social and Economic Impacts.

#### **Response to Comment Ind 681-7**

The commenter is concerned that the project will cause ground collapse or sinkholes. The commenter is referred to Master Response 29 - Near Surface Workings.

#### **Response to Comment Ind 681-8**

The commenter states that the property values will be negatively impacted if groundwater wells are affected by the dewatering of the mine. Regarding the impacts to groundwater wells, the commenter is referred to Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding economic impacts to property values, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

#### **Response to Comment Ind 681-9**

This comment is about the potential jobs generated by the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

#### **Response to Comment Ind 681-10**

The commenter opposes the project and urges the County not to approve it. The commenter's opposition to the project is noted for decision makers. See Master Response 1 - Non-EIR/Administrative Issues.



Individual Letter 682

*WE DO NOT SUPPORT*  
I support re-opening the Idaho-Maryland Mine

RECEIVED  
FEB 22 2022  
NEVADA COUNTY  
BOARD OF SUPERVISORS

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than \$122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Robert & Francesca Erickson

Address 144 Success Mine Loop ZIP 95945  
Grass Valley CA

Phone 530-205-9751

Email Address erickson.robert580@gmail.com

Dist 3

Ind 682-1



## **INDIVIDUAL LETTER 682: ROBERT AND FRANCESCA ERICKSON**

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### **Response to Comment Ind 682-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 683**

**From:** [Robert Gulbis](#)  
**To:** [BOS Public Comment](#)  
**Subject:** no mine  
**Date:** Tuesday, February 1, 2022 12:00:31 PM

Dist 4

**CAUTION:** This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**Ind 683-1**

Greetings,

As a long term resident of Nevada County, I would like to express my very clear opposition to reopening the Idaho Maryland mine. There are numerous reasons why I feel this way, and implore the BOS to reject any proposal to reopen this mine.

**Ind 683-2**

Most obvious to me, is the draining and potential pollution of the groundwater. At this time of unprecedented wildfire danger, pumping millions of gallons of groundwater per day and flushing them down the river seems to be one of the worst ideas ever presented. If the forest has been suffering from drought, this will compound the danger many-fold.

**Ind 683-3**

The other major concern I have deals with the track record of this firm and its CEO. They have had numerous violations regarding environmental stewardship. As a landlord, when doing due diligence about potential tenants, if I contact a former landlord who tells me the tenant trashed the property I disqualify the application. This CEO will try to sweet talk you about his/their intentions, do not be swayed as this is lip service & nothing more. This leads to another significant concern, which is that this is not a local company. These people will be taking the lion's share of any profits away from this region, permanently. Yes there will be some new jobs for as long as certain profit margins are met. But those jobs will pay a fraction of what is being siphoned out of the project. And then when the project ends they will turn tail and leave without ever looking back. The only evidence of their presence will be damage to the environment and prolonged legal entanglements trying to make the owners be held fully accountable. The defense team will be paid for by what was once Nevada County gold, while the prosecution will be underfunded due to the economic impact of the mine re-closing.

Please reject this proposal and take the option of re-opening the Idaho Maryland mine off the table. This is a choice of basic decency.

Sincerely,  
Robert Gulbis



## **INDIVIDUAL LETTER 683: ROBERT GULBIS**

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### **Response to Comment Ind 683-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 683-2**

The comment does not directly address the adequacy of the DEIR. Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, Master Response 16 – Drought and Climate Change, Master Response 33 – Groundwater Dependent Vegetation, and Master Response 35 – Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 683-3**

The comment does not address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 684**

**From:** [Robert Gulbis](#)  
**To:** [BOS Public Comment](#)  
**Subject:** no mine  
**Date:** Tuesday, February 1, 2022 12:00:31 PM

Dist 4

**CAUTION:** This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**Ind 684-1**

Greetings,

As a long term resident of Nevada County, I would like to express my very clear opposition to reopening the Idaho Maryland mine. There are numerous reasons why I feel this way, and implore the BOS to reject any proposal to reopen this mine.

**Ind 684-2**

Most obvious to me, is the draining and potential pollution of the groundwater. At this time of unprecedented wildfire danger, pumping millions of gallons of groundwater per day and flushing them down the river seems to be one of the worst ideas ever presented. If the forest has been suffering from drought, this will compound the danger many-fold.

**Ind 684-3**

The other major concern I have deals with the track record of this firm and its CEO. They have had numerous violations regarding environmental stewardship. As a landlord, when doing due diligence about potential tenants, if I contact a former landlord who tells me the tenant trashed the property I disqualify the application. This CEO will try to sweet talk you about his/their intentions, do not be swayed as this is lip service & nothing more. This leads to another significant concern, which is that this is not a local company. These people will be taking the lion's share of any profits away from this region, permanently. Yes there will be some new jobs for as long as certain profit margins are met. But those jobs will pay a fraction of what is being siphoned out of the project. And then when the project ends they will turn tail and leave without ever looking back. The only evidence of their presence will be damage to the environment and prolonged legal entanglements trying to make the owners be held fully accountable. The defense team will be paid for by what was once Nevada County gold, while the prosecution will be underfunded due to the economic impact of the mine re-closing.

Please reject this proposal and take the option of re-opening the Idaho Maryland mine off the table. This is a choice of basic decency.

Sincerely,  
Robert Gulbis



## **INDIVIDUAL LETTER 684: ROBERT GULBIS**

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### **Response to Comment Ind 684-1**

Please see Response to Comment Ind 683-1.

### **Response to Comment Ind 684-2**

Please see Response to Comment Ind 683-2.

### **Response to Comment Ind 684-3**

Please see Response to Comment Ind 683-3.



**Individual Letter 685**

To: Members of the Nevada County Planning Commission, Nevada County Board of Supervisors, and Nevada County Planning Department Staff  
Attn: Matt Kelley, Senior Planner

Comments on the Draft Environmental Impact Report for the Idaho-Maryland Mine Project

4/3/22

To All Concerned:

The noise issues associated with the reopening and operation of the Idaho-Maryland mine are, by their nature, localized around the immediate surroundings of the Brunswick mine property, the Centennial disposal site and the trucking routes from the Brunswick to the Centennial site (and future, unnamed disposal sites).

The noise concerns listed in the DEIR are the preparation and construction noise at the Centennial site and at the Brunswick site, and the construction noise generated by installing a water main along East Bennet to insure four local well owners' continued water.

Noise is referenced with respect to 1) the source, and 2) the distance to 'The Nearest Receptor'. According to the County General Plan, Table 4.10-4 notes:

- A) Compliance with the above standards shall be determined by measuring the noise level based on the mean average of not less than three (3) 20-minute measurements for any given time period. Additional noise measurements may be necessary to ensure that the ambient noise level is adequately determined.

Ind 685-1





- B) Where two different zoning districts abut, the standard applicable to the lower, or more restrictive, district plus 5 dBA shall apply.
- C) The above standards shall be measured only on property containing a noise sensitive land use as defined in Policy 9.8 and may be measured anywhere on the property containing said land use. However, this measurement standard may be amended to provide for measurement at the boundary of a recorded noise easement or as determined in a recorded letter of agreement between all affected property owners and approved by the County.

Rise has chosen to measure the ambient sound levels of the 'Nearest Receptors', the neighboring parcels, at the property owner's dwellings, which are located at the greatest distance from the source of the sound. The true impact on those parcels of construction noise and ongoing operations, however, can only be determined by measuring at the property boundary.

According to the County General Plan, table 4.10.4, the decision to measure at this boundary is a County decision, so I ask the County to require Rise Gold to reassess the ambient and project noise levels on that basis.

Additionally, the ambient sound levels measured and used for this study date back to 2017/18. This is inaccurate data. The ongoing consequences of this project will not be known until after initial construction has finished and operation of the mine commences, easily 4 to 5 years in the future. I suggest that this analysis predicts only short-term sound level impacts, and does not adequately describe long term impacts to the local community, or to the larger community along the haul routes for mine waste.

Ind 685-2



- Ind 685-3** The study should look at projected future neighborhood growth and make a reasonable evaluation of additional noise in the context of the future ambient conditions in which the mine will be operating.
- Ind 685-4** The study describes in detail how the sound mitigation by terrain and ground cover will contribute to the mitigation of sound in the local neighborhood, and relies on these values for its conclusions, but does not address the time when the waste platform rises above the surrounding foliage and subjects the neighborhood to the direct, unobstructed noise of the fill and compact operation. PGS 762 - 769
- Ind 685-5** The study says: (pg. 764  
“Assuming a bulldozer, grader, excavator, front-end loader and compactor were operating concurrently at the Brunswick and Centennial Industrial Sites during site preparation, the combined noise exposure from the effective noise center of those operations would be 85 dBA Leq and 85 dB Lmax at a distance of 50 feet from the operations. However, the earthmoving equipment would be at various locations on the project sites rather than grouped in a small portion of the sites. To provide a conservative but reasonable assessment of project construction noise generation at the Brunswick and Centennial Industrial Sites, it was assumed that all of this equipment could be operating concurrently, but that the equipment would be spread out over the sites during the site clearing/construction operations. As a result, average noise levels were predicted for the Brunswick and Centennial Industrial Sites preparation activities assuming the noise sources were distributed throughout the sites, whereas maximum noise levels were predicted based on the closest proximity of the equipment to the sensitive receptor locations.”  
This combined sound level would also be true of the later fill and compact operations at the Centennial and Brunswick sites.



↑ This seems is a false assumption, since these machines work jointly to accomplish their task, and would sometimes be operating in close proximity.

Additionally, the suggestion that both the average and the maximum sound levels would be the same, 85 dBa, says that the noise would be ongoing and continuous. Acceptable daytime noise levels of 75dBa would still be like standing next to a busy freeway. This is a major change to a quiet neighborhood, even if it lies within County defined limits.

---

Ind 685-6 Page 786 of the DEIR describes a sound monitoring plan to evaluate the mitigation results of the operation. It says:

“If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed.”

At this point, Rise will have sunk several million dollars into construction and development costs prior to starting operations. Are we to believe that they will just shut down until they can solve the problem, or will they continue to operate and pay fines levied as ‘cost of doing business’? Safeguards should be put in place...

---

Ind 685-7 In fact, sound level calculations for the DEIR Table are based on values for construction noise from The FHWA Roadway Construction Noise Model (RCNM), and shown in Table 4.10-10. These values differ substantially from sound levels shown in the Noise Navigator Sound Level Database, published by the University of Michigan Department of Environmental Health Science. For example, where the RCNM shows Compactor and Front End Loader sound levels at 80dBa, the Noise

↓





Navigator chart lists them as 92 and 93dBa. An Earth Scraper in Table 4.10-10 is listed at 85dBa. In the Noise Navigator chart, it is 107 to 111 dBa.

This calls into question the integrity of the analysis, since the actual machines to be used, the true sound levels of those machines, the real numbers of those machines in use at any given time, and their locations around the working locations at any given time are not actually known.

Other questions to consider –

There will be daytime noise levels resulting from haul trucks to and from the Brunswick site from 6:00AM to 10:00 PM, 7 days a week for 80 years. Do we want this in what is now a quiet, residential neighborhood? What happens to quiet, summer evenings on the back deck and sleeping in on Sunday morning? This is industrial city scheduling, not quiet countryside living.

The period of time from the Wright Bros flight to the moon landing was 66 years. A great deal changed during that time. This project is asking for an 80 year permit. Do we really want to lock Grass Valley and Nevada County into an unchanging heavy industrial existence for substantially longer than it took to get to the moon, while the world changes around us?

We live now in a quiet, rural neighborhood. Despite the DEIR's denials, there IS wildlife living on our property and the mine property. Deer wander the neighborhood freely. There is a resident owl who hoots softly in the evening. We have a neighborhood bear that visits from time to time. The operation of this mine will drive wildlife away, and that and the associated noise will totally change the character of the neighborhood - and much of Grass Valley - from a peaceful rural setting to a noisy, urban/industrial complex totally unlike it is today.

Ind 685-8



Regards,

Robert Hubbard  
12966 Mink Court  
Grass Valley, CA 95945





## **INDIVIDUAL LETTER 685: ROBERT HUBBARD**

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### **Response to Comment Ind 685-1**

The comment is substantively the same as Comment Ind 617-5. The commenter is directed to Response to Comment Ind 617-5.

### **Response to Comment Ind 685-2**

The initial part of this comment is substantively the same as Comment Ind 617-4. The commenter is directed to Response to Comment Ind 617-4. With respect to the evaluation of long-term noise impacts, noise generated by the mining and processing components of the project would not change appreciably over time. Following completion of the engineered fill operations at both the Brunswick and Centennial sites, fill material would be hauled off site. Those future operations were evaluated in DEIR Impact 4.10-3 (Long-Term Off-Site Traffic). In addition, as future growth in the area unrelated to the project occurs, ambient traffic noise levels will increase incrementally while noise from the project would not. As a result, the project's contribution to the overall future ambient noise conditions would actually be lower compared to near-term ambient conditions.

In addition, out of an abundance of caution, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Mitigation Measure 4.10-2 also requires quarterly noise monitoring by the County's third-party noise consultant during the first five years of project operation, and once per year thereafter for the life of the project.

### **Response to Comment Ind 685-3**

Commenter suggests that the DEIR needs to study future growth and increased future ambient noise conditions. Anticipated future ambient noise levels, including planned growth and the proposed project, are discussed in DEIR Impact 4.10-6. As future non-project related growth in the area occurs, traffic noise levels will increase incrementally as a result of that growth, while noise generated by the project would remain unchanged over time. As a result, the project's contribution to the overall future ambient noise conditions would be lower compared to near-term ambient conditions. In other words, as background noise increases due to future non-project neighborhood growth, that increase in noise will provide greater masking of project noise compared to existing ambient noise conditions.



#### **Response to Comment Ind 685-4**

The ultimate elevations of the engineered fill areas were included in the three-dimensional noise modelling conducted for the environmental noise analysis. As a result, the condition referenced in this comment was accounted for in the DEIR impact assessment. The commenter is referred to page 6, last paragraph, of the project's Noise and Vibration Assessment (DEIR Appendix L). Additionally, the commenter is directed to Response to Comment Ind 617-6.

#### **Response to Comment Ind 685-5**

This comment is substantively the same as Comment Ind 617-7. The commenter is directed to Response to Comment Ind 617-7.

#### **Response to Comment Ind 685-6**

The project's requirement to comply with the County's adopted noise standards is neither arbitrary nor optional. Approval of the project by itself would not permit the project to generate noise levels in excess of those standards, regardless of how much investment the applicant has made in the project. Because the project does not yet exist, it is impossible to measure the noise generated by the equipment operating at the site prior to the project being approved. Rather, it is necessary to model the noise generation of the proposed project as accurately as feasible to evaluate impacts based on those modelling results. DEIR Mitigation Measure 4.10-3.2 requires implementation of a comprehensive noise monitoring program to ensure that the project's noise levels satisfy the County's noise standards once the project is operational and monitoring can be conducted. The requirements of the measure are summarized in Response to Comment Ind 685-2 above. Contrary to the assertions made by the commenter, the noise measurements will provide a safeguard for the residents, the County and the applicant in ensuring the project's noise generation will be maintained at acceptable levels. Additionally, commenter is directed to Response to Comment Ind 617-9.

#### **Response to Comment Ind 685-7**

This comment is substantively the same as Comment Ind 617-8. The commenter is directed to Response to Comment Ind 617-8.

#### **Response to Comment Ind 685-8**

Commenter is concerned with daytime noise levels, length of the permit, and impacts to wildlife and quality of life. Regarding quality of life, please see Master Response 1 - Non-EIR/Administrative Issues. Noise impacts associated with project traffic on both Brunswick Road and Whispering Pines Lane were evaluated in the DEIR and determined to be less than significant (see DEIR Table 4.10-16). Impacts to special-status wildlife species were also evaluated in the DEIR and found to be less than significant or less than significant with mitigation measures implemented (see DEIR Impact 4.4-2 and Impact 4.4-4). Existing sensitive receptors, including 30 surrounding residences, were chosen as the nearest potentially affected receptors to the project sites. (DEIR p. 4.10-4 and Figure 4.10-2.) Because this comment is editorial in nature, and does not address the adequacy of the EIR, no response is warranted.



**Individual Letter 686**

**From:** Bill Jewel <12bearfarm@gmail.com>  
**Sent:** Sunday, April 3, 2022 2:47 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** mine

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- Ind 686-1**

  - Hello from the Jewels at 11948 E Bennett rd.  
I have a few concerns with the reopening of the mine.

If Mr Mossman and his organization want this to happen then put up all capital needed to address these issues.

The groundwater model has fundamental flaws in the initial start point and baseline data assumptions – all of which throw off the entire analysis.

**fix the model so that it is correct.**
- Ind 686-2**

  - Dealing with mine waste – Asbestos will be a huge and expensive problem that requires far more comprehensive management than described in the report.

**get a qualified estimate of the cost of this and then multiply it by 50 and put this money in escrow to deal with it**
- Ind 686-3**

  - Greenhouse gas emissions - The report excluded elements that would put the project over an arbitrary threshold limit, but recent climate change goals say the threshold should be "net zero".

**it would be great to have zero emissions but we all know that will never happen**
- Ind 686-4**

  - Cleanup of the toxic, pre-superfund Centennial site that would be used to dump mine waste is not included in the DEIR but is required by the California Environmental Quality Act (CEQA).

**before any new mine operations are to begin any and all toxic issues on any proposed sites WILL BE cleaned up. get a qualified estimate for this and multiply this by 100 and put it in escrow. having dealt with hazmat clean up in my time it always seems to fall back on the government when the money is short and the compny files Bankruptcy. Again no new work starts until all prework is complete**
- Ind 686-5**

  - Missing construction time estimates throw off the entire analysis of noise, traffic, and air.
- Ind 686-6**

  - The DEIR incorrectly assesses nighttime noise and underestimates the noise of dumping mine waste near established residential neighborhoods.





Ind 686-7	<p>all working needs to be done during regular business hours.</p> <ul style="list-style-type: none"><li>• Air traffic hazards and aesthetic impacts need to be studied further due the likelihood of a moisture cloud plume that could be created by warm, saturated air ventilation.</li></ul> <p>readdress this</p>
Ind 686-8	<ul style="list-style-type: none"><li>• Blasting plans don't follow U.S. mining guidelines that restrict blasting during evening hours.</li></ul> <p>bring this into compliance</p>
Ind 686-9	<ul style="list-style-type: none"><li>• The plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant.</li></ul> <p>address this</p>
Ind 686-10	<ul style="list-style-type: none"><li>• Meteorological data used to assess the health risk of airborne pollutants doesn't fit Grass Valley's profile or accurately reflect local conditions.</li></ul> <p>needs further investigation</p>
Ind 686-11	<p>well water</p> <p>We received a beautiful letter from RISE GOLD going on about how since my property will need to be shifted to NID water and that they have estimated the cost to be \$85k i would like to know about line routing and the disruption on my property while this is under construction. Again just another number thrown out to make me feel good.</p> <p>Also since i would be moved to NID will I be subject to water cutbacks due to dry years. Reason I ask this is we are building homes in the Brunswick Basin area and NID is selling our water to Roseville as I understand.</p> <p>Roadways.. since there will be no tax benefit from the mining operations to the county will there be a roadway repair fund to cover the ongoing costs of upkeep? We will need this.</p> <p>Let me be clear that the Jewels don't want the mine to reopen.</p> <p>But if all conditions are met and Mr Mossman and company put up all the required funds and do all the front end work before starting any mining activity then I guess it may happen.</p> <p>Robert and Victoria Jewel</p>



## **INDIVIDUAL LETTER 686: ROBERT JEWEL**

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### **Response to Comment Ind 686-1**

The commenter states that the groundwater model is flawed in the initial start point and baseline data but provides no specifics as to the flaws. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model.

### **Response to Comment Ind 686-2**

The commenter states that asbestos will be a huge and expensive problem that requires more management than described in the DEIR and the money for management should be put in escrow. However, the Health Risk Assessment is based on conservative assumptions that likely overestimate asbestos exposure. The commenter is referred to Master Response 22 – Conservatism used for Asbestos Assumptions.

As stated on page 4.3-42 of the DEIR, use of the NSAQMD's cancer and noncancer thresholds to assess health risk significance for CEQA is consistent with AB 2588 risk assessment procedures. The threshold of significance for health risk is an increased cancer risk of >10 cases per million persons. The Health Risk Assessment prepared for the project concludes that the health risk to the most sensitive receptor will be below this threshold.

Nevertheless, the DEIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the EIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

### **Response to Comment Ind 686-3**

The commenter states that the DEIR excluded elements that would put the project over a net zero threshold. The commenter is referred to Master Response 28 - Greenhouse Gas Credits.

### **Response to Comment Ind 686-4**

The commenter states that the remedial cleanup of the Centennial Industrial Site must be included in the DEIR. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

### **Response to Comment Ind 686-5**

The commenter states that construction schedules missing from the DEIR skew the analysis for other impacts. The commenter is referred to Master Response 24 - Project Construction Schedule.





### **Response to Comment Ind 686-6**

The commenter states that the DEIR incorrectly assesses nighttime noise and underestimates noise of dumping mine waste near residential neighborhoods and that all work needs to be done during regular working hours. However, nighttime noise and dumping of mine waste is analyzed in the DEIR and is less than significant after mitigation. The commenter is referred to Chapter 4.10 of the DEIR and Responses to Comments Grp 21-130 and Grp 21-131.

### **Response to Comment Ind 686-7**

The commenter states that the DEIR must account for air traffic hazards and aesthetic impacts due to the likelihood of a moisture cloud plume. The commenter is referred to Response to Comment Grp 7-95.

### **Response to Comment Ind 686-8**

The commenter states that the DEIR inadequately demonstrates that the project's impacts to biological and aquatic resources are less than significant. The commenter is referred to Response to Comment Grp 21-144.

### **Response to Comment Ind 686-9**

The commenter states that the DEIR does not demonstrate the impact to biological and aquatic resources would be less than significant but provides no further details. The commenter is referred to Chapters 4.4 (Biological Resources) and 4.8 (Hydrology and Water Quality) of the DEIR. The commenter is also referred to Master Response 30 - Biological Study Technical Adequacy, Master Response 32 - Temperature of Mine Water Discharge, Master Response 35 - Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 686-10**

The commenter states that DEIR uses meteorological data that does not reflect local conditions. The commenter is referred to Master Response 17 - Meteorological Data Used in HRA.

### **Response to Comment Ind 686-11**

The commenter states his family would like more information regarding the connection of homes to NID. The engineering details of line routing to individual properties will be determined during the engineering of the potable water line as required by Mitigation Measure 4.8-2(c). Engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.) Homes in the E. Bennett Road area which are connected to NID potable water under the project Well Mitigation Plan would be subject to any NID drought restrictions imposed on its customers.

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.



**Individual Letter 687**

**From:** [Bob Rhodes](#)  
**To:** [BCS Public Comment](#)  
**Subject:** Comment on Rise Grass Valley  
**Date:** Thursday, February 17, 2022 1:03:19 PM

Dist 1

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Dear Supervisors,

Please do not approve the Rise Grass Valley Conditional Use Permit and Reclamation Plan for the Idaho Maryland Mine. I've lived here for 37 years, and I can't find one person who wants to see the mine reopened. I can't understand how the Supervisor's Board can even consider it.

Respectively,

Robert J Rhodes  
117 Walrath Ave  
Nevada City, CA 95959

**Bob Rhodes**  
[rjr@sbbmail.com](mailto:rjr@sbbmail.com)  
530-263-0229

Ind 687-1



## **INDIVIDUAL LETTER 687: ROBERT RHODES**

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### **Response to Comment Ind 687-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 688**

**From:** [Alice Root](#)  
**To:** [Idaho MMEFB](#)  
**Subject:** Opposed to Risegold mine proposal  
**Date:** Saturday, February 12, 2022 7:16:06 AM

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Attn Matt Kelley:

**Ind 688-1**

I am a thirty plus year resident of Nevada County, living in Rough & Ready. Though we were in part drawn to Nevada County because of gold mining, we are opposed to this new mine proposal. We don't live near the proposed mining site, but think this is a terrible idea, at the wrong time and place. If it were proposed out in an unpopulated area, it might be somewhat viable, but to place this in the residential area of Grass Valley is horrific. The traffic and noise would be enough of a deterrent, but the environmental impacts beyond this do not make this a reasonable proposal. Also, this company is financially unstable, and out of the country. Please do not approve this proposal.

**Ind 688-2**

We vote in every election, and will vote and campaign against any supervisor that would approve this.

**Ind 688-3**

Sincerely,

Robert Root  
Rough & Ready, CA



## **INDIVIDUAL LETTER 688: ROBERT ROOT**

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### **Response to Comment Ind 688-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

### **Response to Comment Ind 688-2**

The comment does not directly address the adequacy of the DEIR. Please see Master Response 1. For general traffic concerns, please see Chapter 4.12, Transportation; for general noise concerns, please see Chapter 4.10, Noise and Vibration.

### **Response to Comment Ind 688-3**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





**Individual Letter 689**

Mr. Matt Kelley  
Senior Planner  
Nevada County Planning Dept.  
950 Maidu Ave. Suite 170  
Nevada City, CA 95959-7902

April 3, 2022

Re: EIR Comment: Rise Gold Project

Please accept this comment on the IMM Draft EIR, Vol. 1, Ch. 4.10 (Noise) and insofar as it affects noise, Ch. 4.12 (Transportation).

I previously made a short general comment through the Mine Watch site, reserving my right to comment here.

**Ind 689-1**

The Draft EIR does **not adequately** serve as a CEQA (California Environmental Quality Act) informational and disclosure document. It appears to be drafted to reach a pre-ordained conclusion, which is that no significant impacts could exist from the Project. This conclusion is startling. It strains the imagination that such a Project could exist both adjacent to, and within, an urbanized area and not have at least some significant impacts.

A draft EIR is supposed to highlight significant impacts. That way, the final decision can be made to approve or disapprove in light of those impacts. When a draft EIR fails in this regard, it fails in its purpose to assist decision-making and becomes legally vulnerable to challenge. Challenges under CEQA frequently result in a court order to re-draft the Final EIR.

The draft EIR states that "audibility"--the very perception of sound--is to be categorically dismissed as a significant impact. So if Greater Grass Valley hears industrial and truck noise, the phenomenon cannot be significant, almost by definition. This conflicts with the common sense notion that any noise above quiet is very significant. A quiet neighborhood that experiences distant noise is going to be a less-than-quiet neighborhood, and less desirable.

Grass Valley's topography is such that distant sounds reverberate or echo and can be heard most places. For example, if one is atop Chester St., one can hear noise from the freeway, Main St., and even the Fairgrounds. Instead of asking what impact the Project will have on streets like Chester, the draft EIR is silent.

**Ind 689-2**

The draft EIR explains that the dBA scale is logarithmic, such that each level of noise can be multiple times greater than the previous level. Yet the graphic to



demonstrate this is represented as a thermometer in which the gradations move up from non-logarithmically from the 40 dBA of a quiet residential area to 70 (busy traffic) to 80 (busy street) to higher noise levels that are dangerous to hearing, such as chainsaws at 110 dBA.

Conveniently, the draft EIR finds that at selected monitoring sites, the dBA level will not be a significant increase in the otherwise prevailing sound. Between 7 a.m. and 10 p.m., Project operations will definitely be heard, but that would not be significant? Some 30 sensitive receptors are positioned around the Project site, but not much further away. The furthest out are 3 on Tinloy St. adjacent to the freeway, where noise is considerable and the Project's impact is perhaps less noticeable.

**Ind 689-3**

The monitoring sites in Table 4.10.2 are then reduced to only eleven. Given Grass Valley's topography and spread of residential areas, the monitoring should be much more extensive. Actual noise from large fully loaded trucks should be captured and recorded throughout the main residential areas of Grass Valley. I am convinced that most residents would find annoying and significant the roar of Project trucks in the morning from 7 – 10, and at night from 7-10. Those are the 6 hours during which I have perceived from sound from distant locations.

The Project is forecast to last 80 years. Noise generation lasting over an 80 year span is significant! Recall that in the past, Grass Valley heard stamp mills going 24-7. No one now wants to endure anything remotely like that. The effect on the local economy could be bad, discouraging tourism and depressing home sales.

**Ind 689-4**

The Project is not a good fit in its location. Grass Valley is already a very noisy town, but the Project should not be able to camouflage the Project's impact by saying that the Project's **increase** in noise is not significant.

My hope is that the County of Nevada will reject the draft EIR and insist on additional noise studies and analysis before approving a Final EIR. These studies should monitor sound from sites located all over the Grass Valley area, replicating what the actual Project noise will be, and how it will be perceived.

Thank you for receiving this comment.

Sincerely,

/s/

Robert Shulman

Property owner in Grass Valley, 227 June Dr.



## **INDIVIDUAL LETTER 689: ROBERT SHULMAN**

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### **Response to Comment Ind 689-1**

Commenter disagrees with the conclusions of the DEIR and asserts that any noise is significant. The Project Applicant has proposed to incorporate project design elements to mitigate potential noise impacts by enclosing virtually all processing-related equipment and processes into insulated buildings, and through limitations on hours of operations of certain noise-generating activities which cannot practically be enclosed (i.e., engineering fill operations, transport of fill material to the Centennial Site, etc.). (DEIR pp. 4.10-38 and 4.10-24.) The analysis recognizes that substantial noise control measures will be required to be built into the project design to achieve this objective, and the applicant has committed to incorporate such noise control measures. (Id.) A comprehensive noise monitoring program will be required as a condition of project approval to ensure that the appropriate noise-control measures have been implemented to ensure satisfaction of the County's adopted noise standards. (DEIR 4.10-50.)

The commenter is correct that the purpose of the EIR is to disclose potential impacts of a project. However, as stated in DEIR Section 4.10.4 under "Standards of Significance," CEQA guidelines Appendix G clearly states that, for a noise impact to be considered significant, the increase in noise resulting from the project must be substantial. A substantial increase in noise is defined in DEIR Section 4.10.4 under "Traffic Noise Increase Criteria." As discussed on page 5 of the project's Noise and Vibration Assessment (DEIR Appendix L), audibility is very subjective and can vary from person to person. Thus, audibility is not used as a significance criteria in evaluating noise impacts. In addition, a noise source can be audible without a substantial increase in ambient noise levels occurring. It is important to note that residents in the general project area, including the City of Grass Valley, are currently exposed to noise from existing trucks on the area roadway network, as well as noise from automobile traffic, all of which are audible. An extensive ambient noise survey was undertaken for the project's noise impact assessment to establish baseline ambient conditions to ensure that any identified substantial noise level increases above those ambient conditions would be identified as significant and that appropriate noise mitigation measures would be developed.

The noise prediction model used to quantify the transmission of sound from the project area to the surrounding areas accounts for topography, atmospheric conditions, ground cover, shielding by intervening buildings, noise attenuation provided by building walls and ceilings, and vegetation (see pages 5-7 of DEIR Appendix L). Local topographic survey data was imported to develop a 3-dimensional model of not only the project site but the surrounding neighborhoods as well. (DEIR 4.10-23.) Reverberation (echo) can occur when sound impacts a reflective surface. However, vegetated ground with extensive tree cover, such as that present in the project vicinity, tends to be acoustically absorptive rather than reflective. (DEIR 4.10-24.) Where sounds can be heard over long distances, that phenomenon is frequently attributable to either a lack of intervening topography, vegetation, and ground cover between the source and receiver, or atmospheric conditions conducive to sound propagation. Such conditions are not anticipated to occur due to reflections or echoes at locations with soft ground, irregular topography, and extensive tree cover.

### **Response to Comment Ind 689-2**

Commenter believes the graphic representing the dBA scale is non-logarithmic, while the dBA scale is logarithmic. The graphic referenced in this comment (Figure 2 of project Noise and Vibration Study, DEIR Appendix L), depicts a linear range of sound pressure levels (in decibels), and typical noise sources associated with those noise levels. Although the graph is linear, the



pressures impacting the human eardrum required to generate the decibel levels shown are nonlinear. For example, a decibel level of 70 dB has 10 times more sound pressure energy impacting the eardrum than a decibel level of 60 dB; 100 times more sound pressure energy than a decibel level of 50 dB; and 1,000 times more sound pressure energy than a decibel level of 40 dB. For this reason, decibels cannot be added or subtracted, multiplied or divided without first converting the decibels into sound energy using exponential formulas. Once the arithmetic operations have been applied to the energy, the base-10 logarithm is taken to convert the energy back to decibels. For this reason, 50 dB + 50 dB = 53 dB, not 100 dB.

### **Response to Comment Ind 689-3**

The commenter believes any sound is significant, disagrees with the monitoring sites and believes sound is most significant from the hours of 7-10 am and pm. As noted in the Response to Comment Ind 689-2 of this letter, audibility is not the test of significance for a finding that a project would result in a noise impact. CEQA requires a “substantial” increase in ambient noise levels for a finding of significance, not merely an audible change. Ambient conditions at residences close to and far from the project area vary, as noted by the ambient noise survey results presented in Appendix L of the DEIR. Those ambient conditions were evaluated in the project's noise analysis to ensure that the CEQA criteria were appropriately applied.

The 12 noise monitoring locations identified on DEIR Figure 4.10-3 were specifically selected to be representative of baseline noise exposure of the nearest residences to both the Brunswick and Centennial project sites, and representative of sensitive receptors located along the project's proposed haul routes. Because sound decreases with distance, industry standard convention is to evaluate ambient conditions and potential noise impacts at the nearest sensitive receptors to a project's noise-generating areas. If impacts are not identified at the nearest receptors, it is reasonable and logical to conclude that impacts would not occur at substantially more distant receptor locations. Therefore, monitoring of ambient conditions at receptors located a considerable distance from the project site is typically not required. DEIR Figures 4.10-7 and 4.10-8 indicate that the project's noise generation is projected to be limited to areas in relatively close proximity to the Brunswick Site. Commenter states that “actual noise from large, fully loaded trucks” should be captured in the noise study. Heavy truck activity is common in the project area so the project would not be introducing heavy truck traffic noise into an area where such noise is currently absent. As indicated in Table 9 of the project noise study (DEIR Appendix L), off-site hauling would occur between the hours of 6 am and 10 pm. Given a projected average of 50 heavy truck round trips per day (100 individual passbys), the typical average number of hourly truck passbys on the local roadway network computes to approximately 6 per hour, or one truck passby every 10 minutes during typical operations. The noise generation of heavy trucks operating within the project area were modelled using the Federal Highway Administration Highway Traffic Noise Prediction Model, which is based on an extensive database of the noise generated by all vehicle categories, including heavy trucks. Those modelling results indicated that project-generated heavy truck traffic noise levels would not result in significant adverse noise impacts.

### **Response to Comment Ind 689-4**

This comment raises a concern with the length of the project permit, tourism and economic factors. Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts. The timeline of the project does not affect the evaluation of the project's noise impacts or findings of significance for any identified impacts. This is because the County's noise standards state that the project cannot exceed the specific noise level limits during



any individual hour of any day, regardless of the week, month, or year during which the project is operational.

The ambient noise environment within the cities of Grass Valley and Nevada City varies, depending mainly on proximity to major roadways. At residences located near Highways 49 and 20, ambient noise levels are higher than at residences removed from busy roadways or other noise sources. For this reason, a focused ambient noise survey was conducted in proximity to the nearest residences to the project area to ensure that the impact evaluation properly accounted for baseline ambient conditions.

The portion of this comment pertaining to noise monitoring is similar to Comment 689-3 of this same letter. The commenter is referred to the response to that comment.





**Individual Letter 690**

**From:** Bob & Ann Thorpe <bathorpe@hughes.net>  
**Sent:** Monday, April 4, 2022 4:51 PM  
**To:** Idaho MMEIR  
**Subject:** Idaho Maryland Mine

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**Ind 690-1**

Please be advised that as eighteen year residents of Nevada County we most definitely oppose the reopening of the Idaho-Maryland Mine.

The following are our concerns:

1) Toxic waste site pollution

**Ind 690-2**

2) Harmful chemicals leaching into the aquifer

**Ind 690-3**

3) Noise pollution both from the mining operation and trucks breaking down our roadways

**Ind 690-4**

4) Large scale mining in this day and age is not compatible to the quality of life in our community

**Ind 690-5**

5) Traffic congestion impact

**Ind 690-6**

6) Draining of nearby wells

**Ind 690-7**

7) The quality of life verses the exploitation of the environment does will not benefit this community

Concerned citizens,

Robert and Ann Thorpe



## **INDIVIDUAL LETTER 690: ROBERT AND ANN THORPE**

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### **Response to Comment Ind 690-1**

The commenter's reference to "toxic waste site pollution" lacks specificity. It is unclear whether the commenter is referring to existing site conditions or potential effects of the project on the sites. Please see Master Responses 1, 2, and 8 through 11, as well as the discussions and analysis in Chapter 4.7, Hazards and Hazardous Materials, of the DEIR.

### **Response to Comment Ind 690-2**

The project will not result in harmful chemicals leaching into the aquifer and the commenter provides no evidence to this effect. Please see Master Responses 1, 8, and 35, as well as the discussions and analyses in Chapter 4.8, Hydrology and Water Quality, of the DEIR.

### **Response to Comment Ind 690-3**

Please see Master Response 1, as well as the discussions and analyses in Chapter 4.10, Noise and Vibration, of the DEIR.

### **Response to Comment Ind 690-4**

As discussed in Master Responses 1 and 2, quality of life concerns are outside the scope of CEQA.

### **Response to Comment Ind 690-5**

Please see Master Response 1, as well as the discussions and analyses in Chapter 4.12, Transportation, of the DEIR.

### **Response to Comment Ind 690-6**

Please see Master Responses 1 and 15.

### **Response to Comment Ind 690-7**

Please see Master Responses 1 and 2 – quality of life concerns are outside the scope of CEQA. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 691**

**From:** Bob Wheatley <robertwheatley1099@gmail.com>  
**Sent:** Saturday, April 2, 2022 1:06 PM  
**To:** Idaho MMEIR  
**Cc:** Karin Wheatley; Paula Strang; KIM DERBY; GEORGIE K HUFF; DEIRcomments@cea-nc.org  
**Subject:** Idaho-Maryland Mine Project SCH# 2020070378 Draft Environmental Impact Report concerns

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10591 Salcido Lane

Grass Valley

CA 95949

916-412-5712 (Call/Text)

Dear Mr Kelly

Idaho-Maryland Mine Project SCH# 2020070378 Draft Environmental Impact Report

**Ind 691-1**

I am writing as a family member married to Karin Wheatley, who co-owns, with her three sisters, the property at 10591 Salcido Lane to express my concern on aspects of this project. Our property relies on well water as the domestic water supply and the property borders Wolf Creek in which I and other family members including very young children play and bathe. I am therefore alarmed to read the paragraph at 4.8 -51 which states the presence of **"elevated arsenic levels that could pose a threat to human health"**. I then read the mitigation plan at 4.8-52 Para 4.8 1 (a) and I am concerned at the following

**Ind 691-2**

the absence of any disaster recovery plan should the water purification process fail,

the absence of a detailed description of the water purification process including redundancy and back-up process' in the event the primary system fails,

**Ind 691-3**

no mention of a "cease operation" provision in the event that water samples exceed acceptable limits. Such provision to remain in effect until acceptable standards can be demonstrated to the City and accepted by the City.

I request that the draft environmental impact report be revised/reissued to satisfactorily address the above concerns, the failure of which I would consider sufficient grounds not to allow the project to proceed.

Yours faithfully,

Robert Wheatley



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## **INDIVIDUAL LETTER 691: ROBERT WHEATLEY**

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### **Response to Comment Ind 691-1**

The DEIR evaluates the potential for the proposed project to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality under Impact 4.8-1, which starts on page 4.8-41. Because the DEIR concludes that a potentially significant impact could occur, the DEIR requires Mitigation Measures 4.8-1(a) through 4.8-1(e), which would reduce potential impacts to a less-than-significant level. As provided by Mitigation Measure 4.8-1(a), the Project Applicant would be required to submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) for coverage under the Limited Threat Discharge permit (General Order R5-2016-0076; NPDES No. CAG995002), at least six months prior to construction of the water treatment system. The NOI would be required to include evaluation of potential constituents of concern, including arsenic and to demonstrate that the proposed water treatment plant (WTP) design would successfully treat mine water to meet the water quality standards and treatment goals identified in the Limited Threat Discharge order. Upon construction of the WTP, sampling would be provided to the RWQCB to demonstrate that the treated water meets the water quality standards and treatment goals specified in the Limited Threat Discharge order. Ongoing monitoring of treated water would occur at a location specified by the State prior to the point of discharge at South Fork Wolf Creek.

As stated on page 4.8-53 of the DEIR, consistent with NPDES Permit requirements, the WTP would have backup power source (i.e., generators) in the event of electric power failure or outage.

### **Response to Comment Ind 691-2**

Please see Response to Comment Ind 691-1. Please refer to Appendix K.4, Water Treatment Plant Design Report, for a detailed description of the proposed treatment process.

### **Response to Comment Ind 691-3**

Please see Responses to Comments Ind 691-1 and Ind 691-2. The water treatment plant and discharge of treated groundwater will be permitted by the State (CVRWQCB), who will have regulatory authority to stop mine operations if water quality samples exceed applicable limits.



**Individual Letter 692**

**From:** Robin DeMartini <rdemartini@protonmail.com>  
**Sent:** Saturday, April 2, 2022 8:12 PM  
**To:** Idaho MMEIR  
**Cc:** DEIRcomments@cea-nc.org  
**Subject:** NO to Rise Mine

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- Hello,
- Thank you for this opportunity to express concerns re: The Rise Mine.
- Ind 692-1** COMMON SENSE...
- Why would our beautiful community agree to a toxic, noisy, messy, and poisonous Mine "re-opening"?
- Hasn't the Past proven anything (asbestos, arsenic, heavy metals soil contamination, air and noise pollution)?
- Ind 692-2** The Mine would be allowed to burden our roads with trucks going to and fro 24/7, creating noise, vibrations (affects humans, animals and birds), pollution, toxic dust, traffic and road/asphalt deterioration.
- This would create a financial burden to repair said roads. Is Rise Mine going to pay for that, or Nevada County taxpayers?
- Ind 692-3** And why is it OK for a Corporation to go against any noise ordinance that we (ordinary citizens) follow (keeping our music down, not using machines, leaf blowers and construction tools between certain hours)?
- Ind 692-4** Why do big corporations get to bend all the rules while we take our old paint, oils, toxic materials, and recycling to specific recycle/removal businesses?
- Ind 692-5** I am deeply concerned that this big corporation will allow their water to run off into the earth and nearby streams/creeks...
- Do they have a new invention that proves that their water purification system is clean enough for us to drink/consume as it leeches into our streams and rivers, where fish swim and wildlife drink from?
- Ind 692-6** What about the toxins in the Mine run-off traveling down through our farm lands, into our foods (we all took biology and know how plants depend on clean water, too, right)?
- Ind 692-7** I researched how much water the Mine will use to flush the old mines, really, DURING A DROUGHT?
- Ind 692-8** My biggest concern is that any burden this corporation creates - messy, broken up roads, pollution, noise, poisons, water contamination, threats to animals and birds, and citizen's wells - will end up being our problem to clean up for generations to come.





The ripple effect is staggering.

I do find it inspiring to see our community come together as concerned citizens, free thinkers, and intelligent researchers to see this issue be debated and put down. This Mine needs to be stopped. NO to the Rise Mine!

Thank you,  
Robin DeMartini  
12434 Silk Tassle Cir  
Nevada City, CA

Sent from ProtonMail for iOS



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## **INDIVIDUAL LETTER 692: ROBIN DEMARTINI**

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### **Response to Comment Ind 692-1**

The commenter opposes the project but does not discuss the adequacy of the DEIR. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Responses to specific comments are provided below.

### **Response to Comment Ind 692-2**

The commenter states that the project will cause adverse traffic-related impacts such as damage to local roadways. The commenter states that the project will result in noise, vibration, and toxic dust but does not state how the DEIR is inadequate. Impacts from trucks are analyzed in Chapter 4.10 (Noise and Vibration), Chapter 4.12 (Transportation), Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), and Chapter 4.4 (Biological Resources).

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49 and E. Bennett Road between the project driveway and Brunswick Road. (DEIR, p. 4.12-91.)

### **Response to Comment Ind 692-3**

The commenter implies that the project would exceed local noise ordinances. The DEIR analyzed noise impacts in Chapter 4.10. With the exception of the installation of a potable water line along East Bennett Road, noise impacts would be less than significant after mitigation. (DEIR, p. 4.10-31.)

### **Response to Comment Ind 692-4**

The commenter implies that the Project Applicant will violate environmental standards governing the project but does not state how. A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other State and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 – Operator Responsibility.

### **Response to Comment Ind 692-5**

The commenter is concerned about stormwater runoff from the project sites and the quality of the water discharged to South Fork Wolf Creek. The DEIR analyzed hydrology and water quality impacts in Chapter 4.8 of the DEIR and found impacts to be less than significant after mitigation. The commenter is also referred to Master Response 8 – Mine Waste Characterization and Master Response 35 – Discharge to South Fork Wolf Creek.

### **Response to Comment Ind 692-6**

The commenter states that runoff from the site and/or discharges to South Fork Wolf Creek will contain contaminants. The DEIR analyzed hydrology and water quality impacts in Chapter 4.8 of the DEIR and found impacts to be less than significant after mitigation. The commenter is also referred to Master Response 8 – Mine Waste Characterization and Master Response 35 – Discharge to South Fork Wolf Creek.



**Response to Comment Ind 692-7**

The commenter is concerned about the project's impacts to groundwater supplies during a drought. The DEIR analyzed hydrology and water quality impacts in Chapter 4.8 of the DEIR and found impacts to be less than significant after mitigation. The commenter is also referred to Master Response 16 - Drought and Climate Change.

**Response to Comment Ind 692-8**

The commenter states that any adverse impacts from the project will be shouldered by the County after the project's completion. However, the commenter does not state how the DEIR is inadequate. The impacts that the commenter is concerned with (road damage, water pollution, wildlife, and groundwater) are discussed in the DEIR, the commenter is referred to Chapter 4.12, 4.3, 4.10, 4.8, 4.4 of the DEIR.



**Individual Letter 693**

**From:** Robin Ehlers <robinehlers@comcast.net>  
**Sent:** Saturday, April 2, 2022 9:36 AM  
**To:** Idaho MMEIR  
**Subject:** No mine is worth the cost

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**Ind 693-1**

I am writing to voice my opposition again to the idea of a private company damaging use of land for financial gain. The water table below our land is a necessity to life of this entire community. The thought of a corporation utilizing this water at the risk to every other user of this water is absurd. The EIR is flawed and seems skewed to favor this endeavor. The model has fundamental flaws from inception corrupting the entire analysis. It is time for us as a community to protect and cherish our resources...air...water...dirt...and not contaminate it for the financial gain of a few. It is far beyond time to be the stewards of this earth that we are called to be.

Robin Ehlers



## **INDIVIDUAL LETTER 693: ROBIN EHLERS**

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### **Response to Comment Ind 693-1**

The comment expresses a general opinion that the DEIR is flawed and skewed to favor the proposed project, but does not provide specific examples that would allow for a detailed response. Regarding dewatering concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. For general air quality concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy.





**Individual Letter 694**

Matt Kelley, Senior Planner  
Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959-7902

[Idaho.MMEIR@co.nevada.ca.us](mailto:Idaho.MMEIR@co.nevada.ca.us)



March 30, 2022

Re: Idaho-Maryland Mine Reopening Project, DEIR Comment: Inadequate Mitigation of Wild Fire Danger

The greatest Rise Gold Mine negative impact affecting wildfire is the trucking and traffic that this heavy industrial complex would add to the evacuation of the populace in the event of a fire in the circulation area of the mine. This concern is included as one of the three impacts that are Significant after mitigations noted elsewhere in the DEIR.

**Ind 694-1**

Statements found on DEIR pages 4.13-1, 4.15-15 that state 50-100 trucks per day, carrying 20 tons of rock per truck, will be driving on Brunswick Road, classified as a "Minor Arterial" road, 16 hrs. a day, 7 days a week. The DEIR is inadequate by not considering the extremely significant impact on fire evacuation of that area.

Plus "up to 18 additional truck trips could occur per day for various operations" for five years, also for 16 hours a day, seven days a week. This 118 trips per day of trucks does not include personnel in their own vehicles. As stated in this DEIR, this will constitute approximately 7.4 hauling truck round trips per hour on Brunswick Road. This is a significant amount of additional traffic coming into the basin and intersection of Brunswick Road and State Route 20/49. In an evacuation in that part of the County will have evacuees in their vehicles coming from all points east of Highway 20/49 if SR 174 is closed. This area was a serious bottle neck with the Bennett Fire in 2021.

**Ind 694-2**

This will not "have a less than significant impact on emergency response plan or emergency evacuation plan", and yet no mitigation is required as stated on page 4.13-17. This must be changed to a "significant and unavoidable" impact on Transportation in spite of mitigations on the Brunswick and SR20/49 intersection. If no mitigation can be found, I believe that the Project must not be approved.

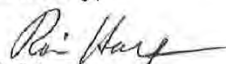
**Ind 694-3**

The DEIR also proffers wild fire mitigations for the Brunswick site including clear cutting -- "vegetation reduction"-- on 18.5 acres of the 58 acres of forest. On the Centennial site, 6.5 acres of the 10 acres of forest will be cut down. The environmental impact of a 25-acre clear cut has to be mitigated.



- Ind 694-4** The report goes on to renumerate the fuel treatment projects far and wide in western Nevada County, which is of questionable relevancy especially since they are distant projects (some of which have been seeking funding for years).
- Ind 694-5** Why is there an inclusion in the description, in this section of the DEIR, to install a potable water line for residents along East Bennett Road as an example of roadside fuel reduction? There is already a Right of Way on the road to install such a pipeline so what fuel reduction will be done in digging up the road? This potable water line has been proposed to be installed by N.I.D. and paid for by Rise Gold since the wells along this road are anticipated to be negatively impacted. Why is putting a water line in being used as an example of “fuel reduction” to reduce wildfire hazard? This section needs reconsideration.
- Ind 694-6** Rise Gold’s Fire Protection Plan needs to address the explosives that are being trucked in, that during a wildfire, if fire consumes the truck(s), and the explosives or the diesel tanks ignite.
- Ind 694-7** Why does the DEIR include a “fire flow system” as support of mitigation to “less than significant” impacts and then state, page 4.13-20 paragraph 3, that it is not known if the old fire flow infrastructure used by the lumber mill, even meets CFC requirements? Please review this for validity.
- Ind 694-8** The “comprehensive vegetation management plan” required by the County Fire Marshall’s Office needs to be provided before the DEIR can be certified.
- Ind 694-9** The DEIR states that the CAL FIRE station on Ridge Road could reach a theoretical fire at the mine within the 5-minute response time goal. The DEIR acknowledges the response time is “depending on local traffic conditions”. Once again, the unmitigable and significant impact of traffic at Brunswick Road and SR 20/49 makes this significant and unavoidable.
- Ind 694-10** There are several issues that I haven’t covered in the comment, but these are sufficient to reject the DEIR. When it comes to wild fire danger, impacts that cannot be mitigated, but are significant and unavoidable render this project too dangerous to approve.

Sincerely,



Robin Hart

110 Berriman Loop

Grass Valley, CA 95949

530-271-7121 rhstarbird@gmail.com



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## **INDIVIDUAL LETTER 694: ROBIN HART**

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### **Response to Comment Ind 694-1**

The commenter states that the DEIR is inadequate because it fails to analyze project traffic during an emergency evacuation scenario. The commenter is referred to Master Response 5 - Evacuation Zones.

### **Response to Comment Ind 694-2**

The commenter states that the DEIR's finding that Impact 4.13-1 as "less than significant" is incorrect and must be changed to "significant and unavoidable." However, the commenter does not provide evidence as to why the DEIR is inadequate in this regard. The commenter is referred to Master Response 5 - Evacuation Zones.

### **Response to Comment Ind 694-3**

The commenter states that the removal of vegetation must be mitigated. The commenter does not state how the DEIR is inadequate. Impacts to vegetation communities are evaluated in detail in Chapter 4.4, Biological Resources, of the DEIR.

### **Response to Comment Ind 694-4**

The commenter states that the "Fuel Treatment Efforts" section of the wildfire chapter is irrelevant to the DEIR. The purpose of Section 4.13.2, including Fuel Treatment Efforts, of the DEIR is to describe the existing wildfire setting in the project region as stated on page 4.13-1 of the DEIR.

### **Response to Comment Ind 694-5**

The commenter asks why the installation of the potable water pipeline along East Bennett Road is included in the DEIR as an example of fuel treatment. The project does not propose to conduct fuel treatment along East Bennett Road. As stated on page 4.13-5 of the DEIR, with respect to planned but not yet funded fuel treatment projects in the immediate vicinity (i.e., grant application submitted but award not yet confirmed), the primary project is roadside vegetation management (to create defensible space) along East Bennett Road, where the potable water pipeline would be installed, as well as the portion of Brunswick Road along the frontage of the Brunswick Industrial Site. Similar roadside vegetation management is also proposed along Greenhorn Road, east of the Brunswick Industrial Site.

### **Response to Comment Ind 694-6**

The commenter states that the DEIR must address the possibility that a wildfire will ignite explosives being transported to the project site. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary.

### **Response to Comment Ind 694-7**

The commenter asks why the DEIR describes the installation of a fire flow system at the Brunswick Industrial Site and then states that it is unknown if the existing fire flow system meets California Fire Code requirements. The fire flow system is not constructed yet. As stated on page 4.13-20, two existing fire service lines extend into the Brunswick site. The installation of the fire flow system for the project would be required to meet California Fire Code (CFC) requirements.





**Response to Comment Ind 694-8**

The commenter states that the comprehensive vegetation management plan described on DEIR page 4.13-20 must be provided to the County Fire Marshall before the DEIR can be certified. The commenter is incorrect. The vegetation management plan is not required to be submitted until improvement plans such as grading or building permit applications are submitted. Mitigation Measure 4.13-2 requires that in conjunction with submittal of Improvement Plans, the Project Applicant shall submit a comprehensive vegetation management plan, inclusive of the Centennial and Brunswick Industrial Sites, for the review and approval by the County Fire Marshall's Office. The applicant shall implement all provisions of the vegetation management plan during the project construction, operations, and reclamation activities. The mitigation measure has been formulated to include sufficient performance standards that must be met, in accordance with the requirements in CEQA Guidelines Section 15126.4(a)(1)(B).

**Response to Comment Ind 694-9**

The commenter states that the DEIR is incorrect in stating that firefighters from the CalFire Station on Ridge Road could respond to a fire at the project site within five minutes because of traffic impacts at Brunswick Road and State Route 20/49. The project does not create significant and unavoidable traffic impacts at Brunswick Road and State Route 20/49. The commenter is referred to DEIR Chapter 4.12 (Transportation).

**Response to Comment Ind 694-10**

The commenter states that the DEIR incorrectly assesses wildfire impacts as less than significant but does not provide any specific information or state how the DEIR is inadequate. Responses to specific comments are provided above. The commenter's opposition to the project is noted for the decisionmakers.



**Individual Letter 695**

**From:** [robin.the.milams.com](mailto:robin.the.milams.com)  
**To:** [Community Development](#); [Planning](#); [Idaho MMEIR](#)  
**Subject:** Idaho Maryland Mine EIR Public Review schedule  
**Date:** Tuesday, January 4, 2022 8:33:13 PM

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CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Nevada County Planning staff,

I see that the EIR for Idaho Maryland Mine was just released. Please tell me that the public comment period will be extended by at least 30 days if not more.

Many residents and businesses do not have power or internet and will not for days or maybe even weeks to come. People and organizations are rightfully far more focused on recovery from this event and will lose several weeks if not a month of critical review time. The EIR release announcement is being buried by so many other priorities, that people do not have the cycles to review it properly at this point.

In fairness to all parties, an extension of the public review period is warranted.

Wishing you a safe, healthy, prosperous and sane 2022!

Robin Milam  
Greenhorn/Lost Lake Road Community  
530 263-1483

**Ind 695-1**





## **INDIVIDUAL LETTER 695: ROBIN MILAM**

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### **Response to Comment Ind 695-1**

The public review period began on January 4, 2022 for a 60-day public review period, which was extended to April 4, 2022 for a total public review period of 91 days.



**Individual Letter 696**

**From:** Maman <r.katherine.res@gmail.com>  
**Sent:** Monday, April 4, 2022 4:15 PM  
**To:** Idaho MMEIR  
**Subject:** Idaho-Maryland Mine proposal

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Dear Commission:

My name is Robin Resovich and I am a resident of Grass Valley.

I am extremely concerned and disheartened to witness my community seriously considering going back in time to destructive mining practices. We should be moving forward economically and environmentally, not backwards. Our county has yet to fully recover from the ravages of our mining past.

Please do not allow this unenlightened project to move forward.

Thank you,

Robin Resovich

**Ind 696-1**



## **INDIVIDUAL LETTER 696: ROBIN RESOVICH**

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### **Response to Comment Ind 696-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 697**

**From:** [Ron Rosner](#)  
**To:** [hcofsupervisors](#)  
**Subject:** proposed mine opening  
**Date:** Tuesday, February 22, 2022 6:50:43 AM

Dist 1

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Dear Sirs/Madams,

Allowing the opening of the proposed Idaho-Maryland mine would be an unthinkable travesty. Ours is not an industrial community. The damage to the water table, and the pollution from the huge number of trucks expected, would greatly decrease the quality of life for those living here.

Please do the right thing.

Ron Rosner DVM  
15737 American Hill Road  
Nevada City

**Ind 697-1**



## **INDIVIDUAL LETTER 697: RON ROSNER**

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### **Response to Comment Ind 697-1**

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Responses 1 and 2. Regarding water table concerns, please see Master Response 15. Regarding truck exhaust concerns, the DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.





Individual Letter 698

IDAHO-MARYLAND MINE PROJECT  
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Ronano Julia  
Address: 14825 SONTAG ROAD, GRASS VALLEY 95945 CA  
Organization (if applicable): \_\_\_\_\_

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

**Matt Kelley, Senior Planner**  
Nevada County Planning Department  
950 Maidu Avenue  
Nevada City, CA 95959-8617  
Idaho.MMEIR@co.nevada.ca.us



Ind 698-1

I am against the opening of the mine for the following reasons:

Ind 698-2

→ Release of toxic chemicals in the aquaphere, air and surroundings environment.

Ind 698-3

→ Impact on the water while experiencing a drought

Ind 698-4

→ Lack of accountability in the impact of the same corporation in Canada

Ind 698-5

→ Lack of knowledge about NEAL environmental impacts (wells level and efficiency for example)

Ind 698-6

→ Against the noise pollution

→ Against the industrial impact of the quality of life. (we chose to buy a house here for the sacred natural environment, not to be surrendered by industrial complex)



## **INDIVIDUAL LETTER 698: RON AND JULIE**

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### **Response to Comment Ind 698-1**

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. The project will not result in release of harmful chemicals into the aquifer and the commenter provides no evidence to this effect. Please see Master Responses 1, 8, and 35, as well as the discussions and analyses in Chapter 4.8, Hydrology and Water Quality, of the DEIR.

### **Response to Comment Ind 698-2**

Please see Master Responses 15 and 16.

### **Response to Comment Ind 698-3**

Please see Master Response 3.

### **Response to Comment Ind 698-4**

The comment expresses a general opinion that the commenter has not been given the opportunity to learn about the “real environmental impacts,” but does not provide specific examples that would allow for a detailed response. For well concerns, please see Master Response 15.

### **Response to Comment Ind 698-5**

For the general noise concerns, please see Chapter 4.10, Noise and Vibration.

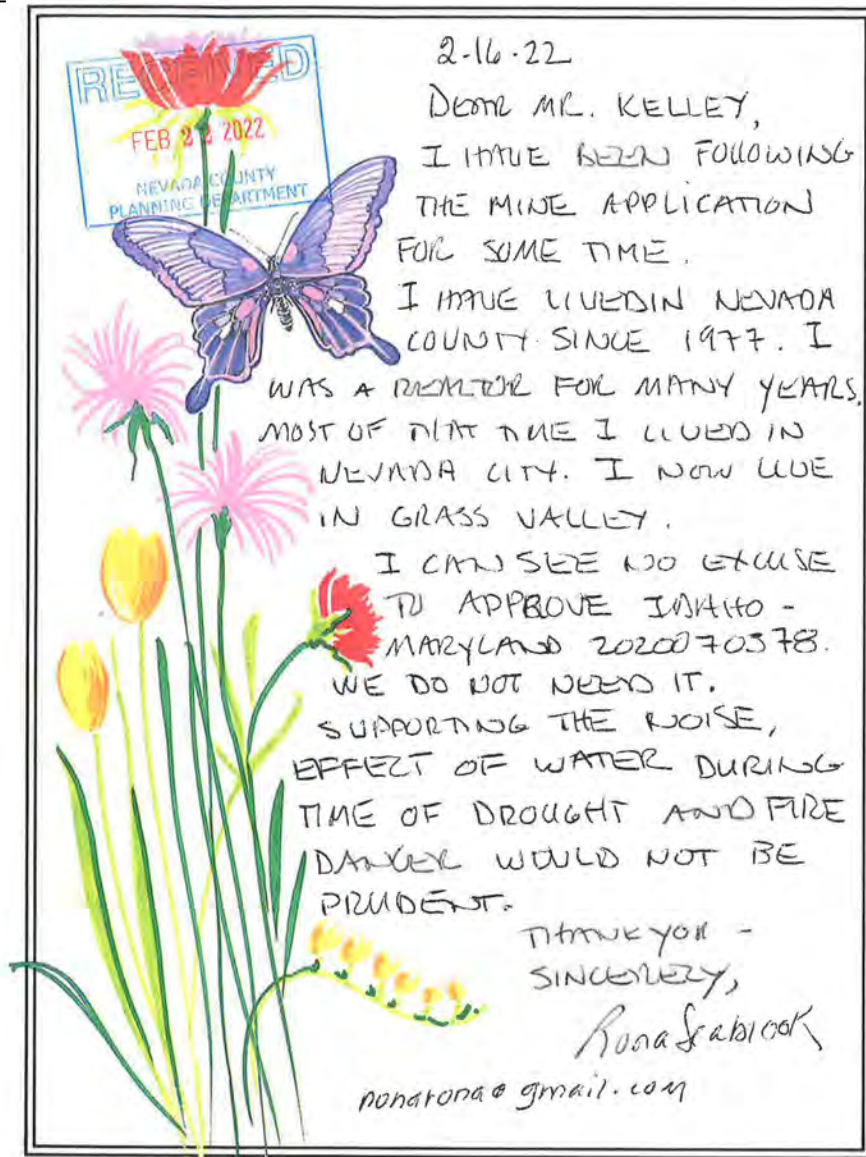
### **Response to Comment Ind 698-6**

Quality of life concerns are outside the scope of CEQA. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



Individual Letter 699

Ind 699-1



## **INDIVIDUAL LETTER 699: RONA SCABLOOK**

---

### **Response to Comment Ind 699-1**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1, 2, 6 (Wildfire Impacts), 15 (Adequacy of Groundwater Monitoring Wells), and 16 (Drought and Climate Change). The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.



**Individual Letter 700**

**From:** Ronald A Dow <ronow1@icloud.com>  
**Sent:** Sunday, March 27, 2022 11:00 AM  
**To:** Idaho MMEIR  
**Subject:** I am strongly opposed to reopening the mine.

**Ind 700-1**

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Ron Dow





## **INDIVIDUAL LETTER 700: RONALD DOW**

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### **Response to Comment Ind 700-1**

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration.



**Individual Letter 701**

**RECEIVED**

FEB 17 2022

NEVADA COUNTY  
BOARD OF SUPERVISORS

Dist 1



**RONDAL SNODGRASS**

CONSULTATIONS

February 16, 2022

To the Nevada County Board of Supervisors

First District  
Heidi Hall

Second District  
Ed Scofield

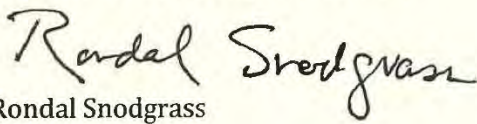
Third District  
Dan Miller

Fourth District  
Susan Hoek

Fifth District  
Hardy Bullovk

I respectfully submit this letter of concern for your attention.

Thank you for serving our County,

  
Rondal Snodgrass

Ind 701-1

14582 Alderwood Way Nevada City, CA 95959 707-496-8729 ravenswatch@asis.com



February 16, 2022

Open Letter to the Nevada County Board of Supervisors and Planning Commission

I have studied with much interest and concern about the application of Rise Gold to reopen the Idaho-Maryland mine. The potential environmental impacts are serious as are reported in the Draft Environmental Impact Report

In their application, Rise Gold is proposing extensive mining operations that could greatly alter the peaceful climate of Grass Valley, disrupt normal commerce, and re-create the very dangerous industry of underground mining.

When considering the viability of such a corporate development proposal it calls upon good business practices to ask for the credentials of the applicant, require proof of economic viability, a business history, and the resume of the representative leadership.

I have learned that Rise Gold is a speculative company. They have no business history. The present stockholders are gold investors throughout the U.S, Canada, off shore, and Wall Street. It is a company formed without capital needed for the project, but raised money through loans and stock sales to get the land, pay for EIR consultants and hire a public relations firm. Some commentators on gold driven companies say they mine stock value, and hope for gold. They are creating profits by manipulating value as they use government processes, and public relations. The permit if ever granted would multiply stock values. That permit could then be sold.

Ind 701-2

A glaring and shocking fact that I uncovered is that the Rise Gold's present CEO has previously been embroiled in a failed mine, financed in this same way, up in British Columbia. The corporation he managed, called Banks Island Gold Ltd, declared bankruptcy when the government ordered the mine closure. The mine's safety engineer became a whistle blower, sending photos of damage to government officials, bringing in helicopters and regulators. At that time there were 35 charges of failed compliance regarding environmental and safety standards. Court cases continue with fines and appeals of this CEO's role in the mine failure.

The mine is located on Banks Island, off shore from Prince Rupert, and is within territory of the Indian Gitxala Nation. They are outraged with the damage, possible destruction of traditional bird, fish and animal habitat, and the mess that must be cleaned up. The costs of remuneration are hundreds of thousands of dollars with the public and the government of British Columbia stuck with most of the cost. Banks Island Mine Ltd. did not post adequate bonds to cover such potential damages. A sad personal story is that the employees of Banks Island Mine Ltd. did not receive their severance benefits. Also there are pages after pages of unsecured creditors that were not paid.



Nevada County must look at the Rise Gold application with extreme caution. I read from newspaper accounts and Rise Gold's press releases that the application is costing a huge amount of money. There are hundreds of hours of county and related agencies staff time, and for the volunteers on the planning commission, and much angst, concern and interest of the general public.

Ind 701-3

It's very interesting that even Rise Gold itself cautions investors and states on its website:  
*"No current mineral resources or mineral reserves have been defined... The Company has not completed a feasibility study to establish mineral reserves and therefore has not demonstrated economic viability for the Idaho Maryland Mine."*

Ind 701-4

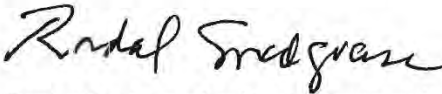
And also, very concerning is this from the Securities and Exchange Commissions reports about Gold Rise's publicity:  
*"such press releases that contain forward looking statements within the meaning of applicable securities laws... Words such as plan, expect, intend, believe, anticipate, and estimate that certain events or condition may or will occur, accordingly readers should not place undue reliance on forward-looking statements and information contained in this release."*

Ind 701-5

Rise Gold stated the estimated cost of the project would be \$100 million dollars for full development. They have requested an 80-year permit, which is extreme, into the next century! That's four generations into the future.

To insure the viability of the applicant, the County should require Rise Gold to post performance and environmental safety bonds to continue being a permit applicant. I suggest 7% or \$7million. We need to look at this with eyes wide open. Without such safety, we could end up like other towns, and rural areas that were left holding the bag by gold mines for failed promises and non-redeemable environmental damages. Good Insurance covering loss and liability is a common practice and should be required to help safeguard our county's economic, environmental and civic vitality.

Rondal Snodgrass



Rondal Snodgrass has been a Conservation Land Consultant in California for over 30 years and holds a degree in Economics from the University of Oregon



## **INDIVIDUAL LETTER 701: RONDAL SNODGRASS**

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### **Response to Comment Ind 701-1**

This is an introductory comment that expresses general concerns regarding the proposed project. Please see Master Responses 1 and 2.

### **Response to Comment Ind 701-2**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3.

### **Response to Comment Ind 701-3**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 through 3.

### **Response to Comment Ind 701-4**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 through 3.

### **Response to Comment Ind 701-5**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 through 3.





**Individual Letter 702**



**RONDAL SNODGRASS**

CONSULTATIONS



February 16, 2022

To the Nevada County Planning Commission

First District  
Danny Milman

Second District  
L:aura Duncan

Third District  
Robert Ingram

Fourth District  
Mike Mastrodonata

Fifth District  
William Grenno

I respectfully submit this letter of concern for your attention.

Thank you for your voluntary service for our County,

Rondal Snodgrass

Ind 702-1

14582 Alderwood Way Nevada City, CA 95959 707-496-8729 ravenswatch@asis.com



February 16, 2022

Open Letter to the Nevada County Board of Supervisors and Planning Commission

I have studied with much interest and concern about the application of Rise Gold to reopen the Idaho-Maryland mine. The potential environmental impacts are serious as are reported in the Draft Environmental Impact Report

In their application, Rise Gold is proposing extensive mining operations that could greatly alter the peaceful climate of Grass Valley, disrupt normal commerce, and re-create the very dangerous industry of underground mining.

When considering the viability of such a corporate development proposal it calls upon good business practices to ask for the credentials of the applicant, require proof of economic viability, a business history, and the resume of the representative leadership.

I have learned that Rise Gold is a speculative company. They have no business history. The present stockholders are gold investors throughout the U.S, Canada, off shore, and Wall Street. It is a company formed without capital needed for the project, but raised money through loans and stock sales to get the land, pay for EIR consultants and hire a public relations firm. Some commentators on gold driven companies say they mine stock value, and hope for gold. They are creating profits by manipulating value as they use government processes, and public relations. The permit if ever granted would multiply stock values. That permit could then be sold.

**Ind 702-2**

A glaring and shocking fact that I uncovered is that the Rise Gold's present CEO has previously been embroiled in a failed mine, financed in this same way, up in British Columbia. The corporation he managed, called Banks Island Gold Ltd, declared bankruptcy when the government ordered the mine closure. The mine's safety engineer became a whistle blower, sending photos of damage to government officials, bringing in helicopters and regulators. At that time there were 35 charges of failed compliance regarding environmental and safety standards. Court cases continue with fines and appeals of this CEO's role in the mine failure.

The mine is located on Banks Island, off shore from Prince Rupert, and is within territory of the Indian Gitxala Nation. They are outraged with the damage, possible destruction of traditional bird, fish and animal habitat, and the mess that must be cleaned up. The costs of remuneration are hundreds of thousands of dollars with the public and the government of British Columbia stuck with most of the cost. Banks Island Mine Ltd. did not post adequate bonds to cover such potential damages. A sad personal story is that the employees of Banks Island Mine Ltd. did not receive their severance benefits. Also there are pages after pages of unsecured creditors that were not paid.



Nevada County must look at the Rise Gold application with extreme caution. I read from newspaper accounts and Rise Gold's press releases that the application is costing a huge amount of money. There are hundreds of hours of county and related agencies staff time, and for the volunteers on the planning commission, and much angst, concern and interest of the general public.

Ind 702-3

It's very interesting that even Rise Gold itself cautions investors and states on its website:  
*"No current mineral resources or mineral reserves have been defined... The Company has not completed a feasibility study to establish mineral reserves and therefore has not demonstrated economic viability for the Idaho Maryland Mine."*

Ind 702-4

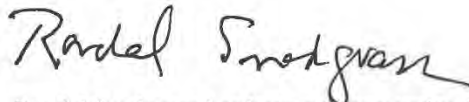
And also, very concerning is this from the Securities and Exchange Commissions reports about Gold Rise's publicity:  
*"such press releases that contain forward looking statements within the meaning of applicable securities laws... Words such as plan, expect, intend, believe, anticipate, and estimate that certain events or condition may or will occur, accordingly readers should not place undue reliance on forward-looking statements and information contained in this release."*

Ind 702-5

Rise Gold stated the estimated cost of the project would be \$100 million dollars for full development. They have requested an 80-year permit, which is extreme, into the next century! That's four generations into the future.

To insure the viability of the applicant, the County should require Rise Gold to post performance and environmental safety bonds to continue being a permit applicant. I suggest 7% or \$7million. We need to look at this with eyes wide open. Without such safety, we could end up like other towns, and rural areas that were left holding the bag by gold mines for failed promises and non-redeemable environmental damages. Good Insurance covering loss and liability is a common practice and should be required to help safeguard our county's economic, environmental and civic vitality.

Rondal Snodgrass



Rondal Snodgrass has been a Conservation Land Consultant in California for over 30 years and holds a degree in Economics from the University of Oregon



## **INDIVIDUAL LETTER 702: RONDAL SNODGRASS**

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### **Response to Comment Ind 702-1**

This is an introductory comment that expresses general concerns regarding the proposed project. Please see Master Responses 1 and 2.

### **Response to Comment Ind 702-2**

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3.

### **Response to Comment Ind 702-3**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 through 3.

### **Response to Comment Ind 702-4**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 through 3.

### **Response to Comment Ind 702-5**

The comment does not address the adequacy of the DEIR. Please see Master Response 1 through 3.





Individual Letter 703



RONDAL SNODGRASS  
CONSULTATIONS



March 30, 2022

Matt Kelley  
959 Maidu Avenue  
Suite 170  
Nevada City, CA  
95959-7902

Dear Mr. Kelley,

Ind 703-1

I will appreciate you sharing the following comments with the Nevada County Planning Commission concerning the DEIR for reopening of the Idaho Maryland Mine. Thank everyone in your department and the volunteer planning commission members for the public opinion meeting on March 24. All requests to speak were honored and accommodations for the overflow crowd were superb.

Ind 703-2

Concern Number: 1  
CEQA requires the presentation of alternatives to the permit for reopening. This is not adequately covered within the DEIR. Requests for re-zoning will impact the surrounding area and County plan. There are public funds available for purchasing this property for alternative uses. The alternative cost used in economic analysis can present impacts positive and negative for granting a permit or not granting a permit and the consequences of such decisions.

Ind 703-3

Concern Number 2:  
There are numerous environmental impacts listed in the DEIR and as required mitigations to eliminate or reduce to acceptable levels those impacts. How can the county monitor such mitigations and deal with the costs and repairs that would result from mitigation failures? How can mitigations investigate the future consolidated costs? A permit request for 80 years is inter-generational, lifetimes away, and must account for the uncertainties of climate, economic and societal changes ahead. Insurance and performance bonds must be posted out front.

Ind 703-4

Concern Number 3:  
CEQA calls for a cumulative impacts analysis for the County and the State of California. This is missing from the DEIR.

Thank you,

  
Rondal Snodgrass

14582 Alderwood Way Nevada City, CA 95959 707-496-8729 ravenswatch@asis.com





## **INDIVIDUAL LETTER 703: RONDAL SNODGRASS**

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### **Response to Comment Ind 703-1**

The comment is an introductory statement and does not address the adequacy of the DEIR.

### **Response to Comment Ind 703-2**

The DEIR evaluates alternatives to the proposed project in Chapter. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.)

### **Response to Comment Ind 703-3**

Please see Master Responses 1 through 3.

### **Response to Comment Ind 703-4**

An analysis of cumulative impacts associated with the proposed project is provided at the end of each technical chapter in the DEIR. In addition, please see the discussions under the Cumulative Setting heading in Chapter 5, Statutorily Required Sections, of the DEIR, which starts on page 5-3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

